

Greater Manchester Health and Social Care Partnership
4th Floor

Date: 28 April 2020

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London Road
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Email: england.gmtop@nhs.net

Dear Colleagues

Re: Operation During NHS Commissioned Hours

We appreciate that this is a challenging time for all and thank you for your work and support during this period. I am writing regarding the processes for making **temporary** changes to operations during NHS Commissioned hours (both core and supplementary hours).

Provisions within the National Community Pharmacy SOP

As the per the Community Pharmacy SOP (<https://www.england.nhs.uk/coronavirus/wp-content/uploads/sites/52/2020/03/Novel-coronavirus-COVID-19-standard-operating-procedure-Community-Pharmacy-v2-published-22-March-2020.pdf>), pharmacies are able close their doors up to 2.5 hours in each working day.

This is to support pharmacies in managing workloads and undertake activities such as restocking or cleaning. It is also to enable pharmacy teams to have a lunch break during the day. Closing the door for up to 2.5 hours is at the discretion of the Responsible Pharmacist. It is not required to inform the Greater Manchester NHS England & Improvement pharmacy team if you are operating in line with the SOP.

However, it must be noted that the pharmacy is not *closing* for 2.5 hours a day; but are operating behind closed doors for this period. You must ensure it is clearly signposted for patients if you are closing your doors during the day and when the pharmacy can be accessed. You must also make it clear for patients how they can contact / access the pharmacy in an urgent situation and make provision for patients to do so. E.G. by ensuring posters are displayed and/or updating the website if applicable.

Inability to Provide Services Outside of Contractor's Control

Whilst NHS England requires pharmacies to remain open their contractual hours (core and supplementary), operating in line with the Pharmacy SOP; at this time, we understand that on any given day an unexpected incidence may occur that necessitates an unplanned closure. As per the terms of service specified in the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 (as amended). Contractors are required to inform NHS England & Improvement of circumstances whereby they are unable to deliver services during NHS commissioned hours for circumstances beyond their control. This is to be reported

to the Greater Manchester NHS England & Improvement pharmacy team as soon as is practicable.

Routinely this information should be reported via using the “Notification of unplanned temporary suspension of services” template form (as per the NHS England Pharmacy Manual, Chapter 36, Annex 14). However, during this period we are happy to accept such reports in an email to england.gmtop@nhs.net as opposed to completing and attaching a separate form; or in a spreadsheet format if reporting for multiple premises. However, during this period, it is important for us to be able to log pharmacy service availability across Greater Manchester on a daily basis. Therefore, please send a notification to the team at the time a decision is taken that it is not possible to operate the pharmacy or within 24 hours.

This route of reporting should be used for instances where it is required to report a one-off instance of non-provision of services such as single day. Also, for a short period of up to two weeks if for example significant numbers of a pharmacy team required to self-isolate and it is not possible to operate.

During this period of non-provision of services, the pharmacy must ensure local GP practices and pharmacies are informed, patients are informed and supported to access services elsewhere and locality commissioners of other services are informed. If required EPS prescriptions must be returned to the NHS spine and support patients to access replacement prescriptions from the prescriber. It is not acceptable to just place a notice on door of the pharmacy stating that you are closed. Contractors must also make appropriate changes to their NHS DOS profile and the NHS website must be updated.

Requests for Temporary Flexibility of NHS Commissioned Hours or Closures

As per the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, as amended, (“the Regulations”) there is provision in Schedule 4, Part 3, Paragraph 27 “Temporary opening hours and closures during an emergency requiring the flexible provision of pharmaceutical services”. This enables contractors to make a request to temporarily alter NHS commissioned hours or close owing to circumstances outside of their control.

As highlighted in the guidance published by PSNC, you are required to liaise with your local NHS England & Improvement Pharmacy Team and then make a formal application. NHS England & Improvement will look sympathetically upon any such requests. **However, it is important that you include clear details and rationale as to why proposed temporary measures are required.** As NHS England & Improvement is required under the Regulations to assess whether you have given “adequate reasons”. It would not be acceptable to simply cite “COVID 19” with no other details. The appropriate application form (available via PSNC website) should be sent via email to England.gmtop@nhs.net

Please note that this process is not a simple notification informing NHS England & Improvement of your intentions. NHS England & Improvement is required to make a determination based on the reasons you provide, and you will be notified of the decision in due course. Whilst NHS England & Improvement need not approve the request in advance of the change/closure, if it ultimately determines that there are inadequate reasons for the changes, the pharmacy would then be required to revert back to its original days and times. Contractors must not make changes without prior engagement with the Greater Manchester NHS England & Improvement Pharmacy Team.

This route should be utilised in circumstances whereby the contractor believes that there is a requirement to close the pharmacy for a sustained period or make ongoing changes to hours of service provision.

During the period of agreed non provision services or agreed changes to operating hours the pharmacy must ensure local GP practices and pharmacies are informed, patients are informed and supported to access services elsewhere and locality commissioners of other services are informed. If required EPS prescriptions must be returned to the NHS spine and support patients to access replacement prescriptions from the prescriber. It is not acceptable to just place a notice on door of the pharmacy stating that you are closed. Contractors must also make appropriate changes to their NHS DOS profile and the NHS website must be updated.

The PSNC website also offers explanation of the revised emergency regulations and links to the appropriate applications forms (via link to PCC site).

<https://psnc.org.uk/our-news/maintaining-pharmacy-services-during-the-outbreak/>

I trust the above offers some clarity and guidance in terms of the correct processes to be followed. Thank you for your help and support with this matter in this period of unprecedented challenge for us all.

Yours faithfully



Mr. Stephen Riley

Senior Primary Care Manager - Optometry and Pharmacy