

Briefing 023/23: Business Continuity Plan for Temporary Suspensions

From 31st July 2023, each NHS community pharmacy must have a *Business Continuity Plan for Temporary Suspensions* due to illness or another reason beyond the control of the contractor/pharmacy owner. Your plan must:

- Be proportionate to the needs of the people who anticipate or are accustomed to using the pharmacy;
- Be relevant to, and available for use at, each pharmacy premises; and
- Include the Terms of Service requirements described in our [Briefing on Business Continuity Plans for Temporary Closures](#).

Those Terms of Service requirements are broadly that your plan must include arrangements for:

- Notifying your Integrated Care Board (ICB) of a temporary suspension and a likely temporary suspension (in accordance with the relevant [approved particulars](#));
- Updating the NHS England Directory of Services (DoS);
- Reducing referrals under Directed Services that relate to urgent care;
- Notifying your main local GP practices and other local contractors of the temporary closure and its anticipated duration;
- Displaying relevant information for patients on the premises (in accordance with the relevant [approved particulars](#)), or for Distance Selling Premises (DSP) pharmacies displaying relevant information on their website; and
- Continuity of care, for example, of patients with booked appointments and those who have supervised administration of medicines.



We have produced guidance on these requirements in the form of a [template](#) plan which, **when completed**, may be added as an annex to your pharmacy's existing business continuity plan (annex 6 if based on our [template](#)) and will help you to comply with the Terms of Service requirements. If your existing business continuity plan already includes these new Terms of Service requirements, you do not have to make any further changes to it.

Implementing your Plan

From 31st July 2023, each NHS community pharmacy/contractor must use all reasonable endeavours to implement their *Business Continuity Plan for Temporary Suspensions* in the event of:

- A temporary closure; or
- A likely temporary closure, in a manner proportionate to the likelihood.

We have produced a [checklist](#) which may be used in the event of a temporary suspension.

This applies both for planned and unplanned temporary suspensions. For a planned temporary suspension, there is likely to be an expectation that the full business continuity plan will be implemented. In the event of a short-notice, unplanned temporary closure of limited duration, it may not be possible to implement the full business continuity plan, particularly if access to the pharmacy is restricted.

For temporary suspensions for illness or another reason beyond your control, you will not be in breach of your Terms of Service as long as:

- You notify your ICB, using the relevant email address on the [pharmacy contract teams' web page](#) – doing so as soon as practicable and wherever possible before the start of the suspension;
- You use all reasonable endeavours to implement your *Business Continuity Plan for Temporary Suspensions*; and
- You use all reasonable endeavours to resume the provision of pharmaceutical services as soon as is practicable.



For likely temporary suspensions, you will not be in breach of your Terms of Service as long as:

- You use all reasonable endeavours to implement the business continuity plan, in a manner proportionate to the likelihood of the suspension; and
- You use all reasonable endeavours to maintain the provision of pharmaceutical services and avoid the suspension.

Additional considerations

The detail required for the plan

There is no requirement for the plan to be overly detailed. It is about ensuring that certain arrangements are included and these lead to relevant actions in the event of a temporary suspension or likely temporary suspension.

The speed with which the relevant actions should be carried out

The arrangements set out in the plan must be proportionate to the needs of the people who are anticipating or accustomed to using the pharmacy. If a closure or suspension is of very short duration, it would not be possible or proportionate for some actions to be carried out, for example, when a locum pharmacist is half an hour late in the morning. In addition, in the event of a temporary suspension, some actions may be given greater priority than others, and some may not be completed by the time the pharmacy reopens and/or the provision of services is resumed.

Likely temporary closures/suspensions

Where a temporary closure/suspension of services is **likely**, the pharmacy must implement the plan as appropriate and proportionate to the likelihood of a closure/suspension. Our template plan should be read in that context. It is suggested that the threshold for notifying your ICB of a **likely** temporary closure/suspension should be relatively high, to avoid a lot of notifications where, for example, a locum pharmacist is subsequently found.



Ideally notifying a closure/suspension in advance

In addition to a requirement to notify of likely temporary closures/suspensions, there is a recommendation that 'ideally' (actual) temporary closures/suspensions should be notified in advance. There is clearly an overlap between the two and pharmacy owners will have to decide which is the more relevant to do. It is suggested that the closer to the time of an (actual) temporary closure/suspension, the more likely you should notify of the (actual) closure/suspension (so that it is notified in advance) and **not** notify a likely closure/suspension. This also saves you notifying twice – first a likely and second an (actual) closure/suspension.

At the end of a temporary closure/suspension

There should also be arrangements for notifying relevant persons, e.g., GP practices, to indicate that the temporary closure/suspension has ended or is ending and that the provision of pharmaceutical services has resumed or will resume (unless notification of the anticipated duration of the closure/suspension has dealt with this issue already).

Further information on Emergency and Business Continuity Planning can be found at cpe.org.uk/BCP. If you have any queries or require more information, please contact: regulations.team@cpe.org.uk