

## Key actions for pharmacy contractors to prepare for a no-deal exit from the EU

The Department of Health's EU Exit Operational Readiness Guidance (which can be found [here](#) including FAQs) is the main source of information on Government plans to maintain the supply of medicines to patients in the event of a 'no-deal' exit from the EU.

These plans include:

- the pharmaceutical companies six-week stockpile of Prescription Only Medicine and Pharmacy-only medicines imported into the UK, from or via the EU or European Economic Area (EEA);
- arrangements for air freight where appropriate;
- additional plans for alternative roll-on, roll-off freight ferry capacity (medicine supplies will be prioritised on these alternative routes);
- other contingency plans including supply on a named patient basis of medicines licensed overseas (other than the EU); and,
- the developing plans for SSPs.

This CPNI summary highlights the recommended actions that pharmacy contractors should take to prepare for a 'no-deal' exit from the EU.

Contractors have been asked to take particular note of Action Card 1 of the guidance (pages 16-24), which indicates that all providers of HSC services, including HSC trusts, primary care organisations and independent sector organisations which provide HSC services, 'must consider and plan for the risks that may arise due to a 'no-deal' exit'.

### Key actions for contractors as part of continuity planning for EU exit readiness include:

*Undertake an assessment of risks associated with 'no deal' EU Exit, covering, but not limited to:*

- *The key areas identified nationally and detailed below*
- *Potential increases in demand associated with wider impacts of a 'no deal' exit*
- *Locally specific risks resulting from EU Exit*

The key areas are:

- Healthcare supply chain including
  - supply of medicines and vaccines;
  - supply of medical devices and clinical consumables;
  - supply of non-clinical consumables, goods and services;
- Cross Border movement and/or free movement of people; and,
- Data transfer risks.

Contractors should assess the implications of the UK's exit from the EU for their business and consider continuity arrangements.

Scope to mitigate one of the main risks for community pharmacy; obtaining medicines and medical devices for supply to patients; will be limited, because DoH advice is that contractors should not stockpile additional medicines or medical devices beyond business as usual stocks. Other mitigations include the concession price mechanism, which is already in place, and a system for Serious Shortage Protocols (SSPs), which is being introduced. Further information on SSPs is available on our [website](#).

- *Family Health Practitioners: Any immediate risks or concerns about provision of HSC service continuity should be escalated to the HSCB in the first instance.*

Contractors should notify their local HSCB office should concerns arise where there is an immediate risk to HSCB service provision.

- *Follow the Chief Pharmaceutical Officer's advice not to stockpile medicines. No clinician should write prescriptions for longer than is usual.*

Contractors should not stockpile additional medicines beyond business as usual stocks and should continue to report current shortage issues through the usual routes including advising CPNI. Any incidences involving the over-ordering of medicines would be investigated and followed up with the relevant HSC Trust or HSC Board.

Contractors should ask staff to reassure patients that the Government has contingency plans for a no-deal exit from the EU, they should not stockpile additional medicines at home and GPs have been asked not to write prescriptions for longer than is necessary for patients. CPNI has produced patient leaflets on medicine shortages which can be found on our [website](#).

- *There is no need for health and social care providers to stockpile additional medical devices and clinical consumables beyond business as usual stock levels. Officials in the Department will continually monitor the situation and provide further guidance where required.*

Contractors should not stockpile additional medical devices and clinical consumables beyond business as usual stocks. More guidance is expected from DoH and CPNI will alert contractors once this becomes available.

- *Consider continuity arrangements to take account of any potential risks that EU nationals may leave Northern Ireland, or frontier workers may experience some form of disruption in getting to work (although this is not considered to be a reasonable worst-case scenario at this stage).*

Contractors should inform staff of the UK's EU Settlement Scheme, which will open fully by end of March 2019 and will remain open until 31st December 2020 in a 'no deal' scenario, as appropriate. A series of information sessions on the scheme for EU Citizens resident in NI, voluntary and community groups and businesses are planned in various locations across NI. Further details on the EU Settlement Scheme and information events are available [here](#).

- *Undertake regular reviews of activity that may lead to potential transfers of personal data from the EU/EEA to the UK, especially those that are critical to patient care and/or would have a serious impact upon the system if they were disrupted.*

A key data protection issue is the transfer of personal data from the UK to the EU/EEA. DoH guidance is that such transfers should not be affected in a 'no deal' scenario, because 'it would continue to be lawful under domestic legislation for health and adult social care organisations to transfer personal data to the EU/EEA and adequate third countries in the same way we do currently.

Finally, contractors are asked to note that the DoH has set up a Departmental Operations Centre, with support from Health and Social Care Board (HSCB), and Public Health Agency (PHA) to deal with any disruption to the delivery of health and social care services in Northern Ireland.

#### **Queries**

- Medicine shortage and pricing queries should be raised through CPNI
- Medical devices and clinical consumables queries to routine BSO PaLS contact
- All other queries should be directed to [EU.Exit@health-ni.gov.uk](mailto:EU.Exit@health-ni.gov.uk)