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RE: Application in respect of a relocation that does not result in significant change to pharmaceutical services provision - Khaliss Limited from 460B Cheetham Hill , Road, Manchester, M8 9JW to 3 Shirley Road, Manchester, M8 0WB

I act for Khaliss Limited in the above application and have been instructed to submit this information in support of my client's application.

My client operates as a distance selling pharmacy. No essential, enhanced or advanced services are provided to patients at the pharmacy premises.

The distance involved in the relocation is approximately 0.4 miles within the same area. As this is a distance selling pharmacy with no patients attending the premises, the distance of the move is not a material consideration.

The Regulations permit a relocation of a distance selling pharmacy subject to meeting the legal test as set out in Regulation 24.

In order to show that my client's application meets all parts of the test under Regulation 24 my client has:

- a. Defined their Patient Group
- b. Shown that, for this Patient Group the proposed location for the pharmacy will not be significantly less accessible; and
- c. Demonstrated that the application meets all parts of the test under Regulation 24.

Patient Group

When considering the definition of the relevant 'patient groups' NHS England is required to consider accessibility "for the patient groups that are accustomed to accessing

pharmaceutical services at the existing premises". In this case all patients fall into a single patient group which is defined as "patients who access services other than at the premises".

As my client does not provide any pharmaceutical services to patients attending at the current pharmacy premises and patients are unable to access pharmaceutical services at the existing or proposed premises there is no patient group that is "accustomed to accessing pharmaceutical services at the existing premises" and therefore no patient group that could find the relocated pharmacy significantly less accessible.

The requirements of regulation 24(1)(a) are therefore met.

As the relocation relates to a distance selling pharmacy my client is required to explain how the procedures used at the premises will secure;

- (a) the uninterrupted provision of essential services during the opening hours of the premises, to persons anywhere in England who request those services, and
- (b) the safe and effective provision of essential services without face to face contact between any person receiving the services, whether on their own or someone else's behalf, and the applicant or the applicant's staff.

We ask that the Committee refers to the attached information which explains the processes and procedures that will be used at the premises.

In addition, NHS England will also consider the other matters required under Regulation 24:

1. In the opinion of the NHSCB, granting the application would not result in a significant change to the arrangements that are in place for the provision of pharmaceutical services

There is no evidence that granting the application would result in a significant change to the arrangements that are in place for the provision of pharmaceutical services. The same services will be provided from the new premises and will be provided in the same manner.

2. The NHSCB is satisfied that granting the application would not cause significant detriment to proper planning in respect of the provision of pharmaceutical services in the HWB's area

My client is not aware of any plans in respect of the provision of pharmaceutical services to which significant detriment would be caused should their application be granted.

3. The services the applicant undertakes to provide at the new premises are the same as the services the applicant has been providing at the existing premises

My client undertakes to provide the same services at the new premises as are provided at the existing premises.

4. The provision of pharmaceutical services will not be interrupted (except for such period as the NHSCB may for good cause allow)

My client confirms that the provision of pharmaceutical services will not be interrupted during the proposed relocation.

For the reasons given above we request that NHS England approves this application.

Yours faithfully,

Conor Daly
Partner
For and on behalf of Rushport Advisory LLP