

Managing Controlled Drugs

Guidance for GP Trainers and Trainees

Introduction

There have been several queries regarding the handling of controlled drugs (CDs) of ST2 and ST3 while in practice. To help give clear guidance, NIMDTA have discussed these issues with HSCB medicines governance pharmacists. They have recently produced a summary document, *Managing Controlled Drugs -Summary Guidance for Primary Care Prescribers*. This is aimed at sessional doctors, but has equal relevance for the trainee scenario. It has been used as the basis for the answers to the FAQs.

http://www.hscboard.hscni.net/medicinesmanagement/Prescribing%20Guidance/index.html#P-1_0

NIMDTA expect training practices to presently comply with governance procedures and have an up to date CD standard operating procedure (SOP). It is good practice to ask the trainee to sign the practice SOP at the beginning of the attachment.

The management and use of CDs by GPs should be considered in the context of the following statement from DHSSPSNI:

All healthcare professionals who hold personal CDs stock must keep their own CD register for any Schedule 2 CDs that they possess, administer or supply, and they are personally responsible for keeping this accurate and up-to-date. This will provide a clear and identifiable audit trail. GPs should not share controlled drugs stock or share a central controlled drugs register as there would be concerns about the legality of possession, onward supply and audit.

FAQs

Does the trainee need to carry CDs?

This judgement is best made following discussion with the trainer, considering how and when it may be needed. At the beginning of practice attachments in ST2, there may be no occasion where the trainee will be acting independently in OOH or on marginal rotas. However, as training progresses and the trainee moves towards more independent practice, it may be necessary that these drugs are carried.

How does the trainee obtain a supply of CDs?

The trainee should obtain a supply of CDs in the same way as any other GP.

- a. These should be obtained under the trainee's own name using a HS21S stock order form. Authorisation for this should be given by the GP (preferably the trainer) whose name appears on the HS21S form. The form must be signed by the recipient, in this case the trainee GP. Trainees should order and collect their own CDs in person.
- b. For Schedule 2 CDs the trainees should bring their CD register to the pharmacy when they collect their stock. A check should be made of the quantity, form and strength of the CD and the CD

register updated with the receipt. The community pharmacist should be asked to sign the register as a witness.

- c. CDs must be stored appropriately immediately on receipt.

Can the trainer give the trainee CDs from his/her personal stock if this is recorded in the trainer's CD register?

As outlined in the statement above, this is not appropriate; GPs should not share CDs.

To avoid this scenario in an emergency, it is best to pro-actively discuss the management of CDs as part of induction. The trainee and trainer can then highlight the time when carrying CDs would be appropriate.

How does the trainee obtain a CD Register?

See Summary Guidance for CD register regulations.

There is no one specific CD Register that should be used; any register that fulfils the regulations is sufficient. A good example is the 'RCGP Register for Recording Controlled Drugs'. This can be ordered from the RCGP bookshop. <http://www.rcgp.org.uk/shop/books/practice-library/register-for-the-recording-of-controlled-drugs.aspx>.

It is the trainee's responsibility to order this in a timely fashion, though we advise that the trainers remind them of this.

Can the CDs be kept in the trainee bag for use by subsequent GPs?

This is not appropriate.

The CDs ordered remain the responsibility of the trainee who has ordered them. The trainee's CD register should provide a clear audit trail of how these have been used.

What should the trainee do with CDs at the end of a post?

The drugs remain the responsibility of the trainee who has ordered the drugs.

If this is an ST2 from August to February, the trainee may not wish to retain them during the subsequent hospital post. If so, the trainee should return any Schedule 2 CDs that are out-of-date or no longer required to a community pharmacy for destruction in the presence of an authorised witness. The appropriate records must be made in the trainee's CD register. It is good practice to return all CDs that are out-of-date/not required to a community pharmacy for destruction.