

Guidance on Private Prescribing of Schedule 2 and 3 Controlled Drugs - (Stock and Named Patients)

Background

The majority of Schedule 2 and 3 Controlled Drug (CD) prescribing by health practitioners will be carried out under the NI Health Service; however there may be occasions when private or non-health service requisitions or prescriptions are required for either stock and/or named patients.

Private or Non-Health Service CD Stock Requisitions

Private or Non-Health Service CD stock may be required by a range of healthcare professionals for use in their practice (Appendix 1).

Examples include:

- Dentists working in a private capacity may require midazolam for either emergency use or conscious sedation
- Doctors working in a private capacity may require specific CDs to treat patients in line with their practice e.g. morphine for severe sports injuries.

In line with legislation¹, private CD stock requisitions for Schedules 2 and 3 CDs must be made using the CDRF1 form (Appendix 2) and in accordance with CD requisition requirements (Appendix 3). Requisitions using headed note paper are no longer acceptable for Schedule 2 and 3 CDs. Notes to aid completion of the CDRF1 can be found on the reverse of the form.

The CDRF1 form should be downloaded each time a form is required and is available at:

<http://www.medicinesgovernance.hscni.net/primary-care/controlled-drugs/private-cds/>

CDRF1 forms should be treated with care. Forms should not be downloaded and stored for use at a later date.

Although it is not a legal requirement, private CD stock requisitions for Schedule 4 and 5 CDs may also be made using the CDRF1 form. Alternatively these may be written on headed notepaper as before.

1. <http://www.legislation.gov.uk/id/nisr/2019/208>

Private or non-Health Service CD Patient Prescriptions (PCD1s)

Private CD prescribing for patients may be required in certain circumstances such as:

- Dentists treating patients in a private capacity where a Schedule 2 or 3 CD is required
- Doctors may occasionally be required to prescribe a Schedule 2 or 3 CD for a patient who is not registered under the NI Health Service e.g. a long-stay visitor (see note below on how to manage emergency situations).

Private prescriptions for Schedule 2 and 3 CDs (including temazepam, tramadol and gabapentinoids) must be written on a standard private prescription form i.e. PCD1 form, and the prescription must be written in line with CD prescription requirements. See Appendix 4. However, in an emergency situation when treatment is considered to be both immediately necessary and clinically appropriate for a patient who is not otherwise eligible to receive Health Service prescriptions, it is acceptable to prescribe the Schedule 2 or 3 CDs under HS arrangements on an HS prescription form. A private prescription is not necessary in these circumstances. The prescriber should be able to justify their reason for prescribing in this way. For further information, please see letter on “Prescribing for Temporary Residents” at the following link: <http://www.medicinesgovernance.hscni.net/primary-care/controlled-drugs/private-cds/>.

Not all practices or prescribers will need to hold PCD1 forms and they should only be ordered if there is an ongoing need for them in the practice.

How to order PCD1 forms.

1. If a supply of PCD1 forms is required the prescriber must complete a PCD1 application form. This form can be downloaded from the Medicines Governance NI website: <http://www.medicinesgovernance.hscni.net/primary-care/controlled-drugs/private-cds/>
Practitioner guidance and associated resources are also available at this link. The completed application form should be sent to the following email address: pcd1applications@hscni.net or alternatively a signed hard copy can be sent to the address on the form.
2. HSCB staff will review all applications for PCD1 forms and, if approved, will ask BSO staff to order a supply of PCD1 forms. These will be delivered to the practitioner within approximately two weeks of BSO receiving the request.

3. Once registered the additional forms may be reordered by the prescriber from the secure printers (currently DLRT).
4. Practitioners are required to treat PCD1 forms with care and in line with the HSCB Prescription Security Guidance.
<http://www.medicinesgovernance.hscni.net/primary-care/medicines-safety-documents/guidelines/>

Appendix 1

Stock Requisitions – Authorised Persons

The following authorised persons can obtain supplies of Schedule 2 or 3 controlled drugs for use in their practice, business or profession:

- A practitioner (this includes doctors, dentists and veterinarians)
- Schedule 2 Controlled Drugs may be possessed by a person or acting person in charge of a hospital or nursing home that is wholly or mainly maintained by a public authority out of public funds or by a charity or by voluntary subscriptions. In other such circumstances, a licence is required. (With Schedule 3 and 4 drugs, the basis of the funding makes no difference and the person in charge may supply and possess under the authority of the Regulations). A doctor or dentist who works there must countersign Schedule 2 and 3 requisitions.
- A person in charge of a laboratory that carries out scientific research or education and is attached to a university, university college hospital or approved institution
- The owner or master of a ship that does not carry a doctor on board
- Requisitions presented by the master of a foreign ship must contain a statement, signed by the appropriate authority (Medical officer in Northern Ireland), indicating that the quantity of the drug is necessary for the equipment of the ship
- The installation manager of an offshore installation (e.g. an oil-rig)
- Registered paramedics, under a Group Authority issued by the DH, who are engaged by and under the control of the Northern Ireland Ambulance Service HSC Trust
- Private paramedics – those operating outside NIAS engagement and who possess the relevant licence issued by DH

Note:

- The CDRF1 form must be used to requisition Schedule 2 and 3 CDs for non-HS purposes. (The NIAS and Hospices are not required to use the CDRF1. See notes on reverse of form)
- The CDRF1 form should be used by all pharmacies when transferring Schedule 2 and 3 CDs between pharmacies.
- GPs obtaining stock for Health Service purposes should continue to use the HS21S form.

Northern Ireland Controlled Drug Stock Requisition Form (Schedules 2 & 3)

The guidance notes on the reverse should be read before completion. All sections must be completed legibly using indelible ink.

Part One - Details of Purchaser

Name of Authorised Person (capitals)			
Occupation (capitals)			
Professional Registration Number e.g. GMC/GDC (if applicable)			
Details of organisation(s) where drugs may be used			
Name Address			
Contact Telephone Number			
Signature of Authorised Person		Date	
Counter Signature (if required – see guidance notes)		Date	

Part Two - Details of Controlled Drugs Requested

Drug Name (in capitals)	Full Details of Strength	Form	Quantity

Purpose for which drugs are to be used (tick in box provided ✓)

1	<input type="checkbox"/>	For use in medical practice	2	<input type="checkbox"/>	For use in dental practice
3	<input type="checkbox"/>	For use in independent hospital/clinic	4	<input type="checkbox"/>	For paramedic use
5	<input type="checkbox"/>	For use in veterinary practice	6	<input type="checkbox"/>	Other (please state reason briefly below)*
*					

Part Three - Details of Supplier and Person Collecting Controlled Drugs

Name & Address of Supplier (Legible Stamp acceptable)			
I confirm that I am authorised to supply controlled drugs in this way and have checked that the recipient is authorised to possess the controlled drugs ordered above. <input type="checkbox"/>			
Name & Role of Person Supplying (capitals)			
Signature of Person Supplying		Date	
To be completed at the point of collection/delivery			
Signature of Person Collecting/Receiving CDs		Date	
If CDs are not collected/received by the authorised person, he/she must provide a written statement confirming the recipient is empowered to collect/receive the CDs on their behalf. <input type="checkbox"/>			
<i>For record-keeping purposes, provide the person collecting/receiving CDs with a copy of the completed form.</i>			

REFERENCE NUMBER
(optional)

Guidance Notes for use and completion of CD requisition forms (CDRF1)

1. This form must be used to order (requisition) controlled drug (CD) stock (Schedules 2 and 3) by:
 - a. Individual practitioners e.g. doctors, dentists and vets for non-Health Service purposes
 - b. Private hospitals/clinics where there is no on-site pharmacy
 - c. Private paramedics operating outside NIAS engagement and who possess the appropriate licence issued by the Department of Health
 - d. Others as required by legislation* e.g. owner or master of a ship, or persons in charge of a laboratory
2. This form should also be used when transferring CDs between pharmacies.
3. The HS21S should continue to be used for obtaining CD stock (Schedules 2 and 3) by GPs for Health Service purposes.
4. The CDRF1 form (together with notes for completion) should be downloaded as required from the HSCB Medicines Governance website at: <http://www.medicinesgovernance.hscni.net/primary-care/controlled-drugs/private-cds/>.
5. An example of a completed form is available on the website for information.

*Exception: Northern Ireland Ambulance Service (NIAS) and Hospices: NIAS and hospice designated forms should be used.

Completion of the form:

Purchaser (Authorised Person):

1. The person ordering Schedule 2 or 3 CDs must:
 - In Part One of the CDRF1:
 - Write in capitals their name, occupation and professional registration number (if applicable).
 - Write the name, address and telephone number of the employing organisation/premises where the CDs will be used.
 - Sign their name and enter the date in the correct boxes at the bottom of Part One. Note: Requisitions for private hospitals/clinics must be countersigned by a doctor (or dentist) working there.
 - In Part Two of the CDRF1:
 - Write the CDs to be ordered (including drug name in capitals, full details of strength, form and quantity). A new line should be used for each drug. An additional form should be used if necessary.
 - Indicate the purpose for which the drug(s) are required.

Supplier:

The person/organisation supplying the CDs (e.g. community pharmacy, wholesaler) must:

1. Check that the purchaser has completed all relevant sections correctly, is authorised to possess the CDs ordered and that the CDRF1 is a genuine and original document (Note: the CDRF1 may be accepted without the "Guidance notes for use and completion of CD requisition forms").
2. In Part Three of the CDRF1:
 - Write the name and address of their own organisation (a stamp is acceptable if legible and includes all details)
 - Tick the box to confirm that they are authorised to supply CDs in this way and that they have confirmed the purchaser is authorised to possess the CDs ordered on the requisition. (Pharmacists should follow MHRA, Home Office and professional guidance when undertaking wholesale transactions. Refer to the guidance on wholesale dealing below).
 - Write their name and role (in capitals), sign and enter the date of supply in the relevant boxes.
 - Community Pharmacies:
 - Request the person collecting/receiving the CDs to sign and date the form in the relevant boxes
 - Where a messenger is used to collect/receive the CDs, tick the box to confirm a written authorisation has been received from the authorised person empowering the messenger to receive the CDs on their behalf. Note: use of messengers is not recommended practice.
 - Provide a copy of the completed form to the person collecting/receiving the CDs.

A reference number box is included for optional use. Suppliers may wish to use for audit purposes.

Community Pharmacists: Completed CDRF1 forms with the exception of veterinary requisitions and those relating to inter-pharmacy stock transfers must be submitted to the Business Services Organisation (BSO) as part of the standard monthly submissions. Section O of the HS30 must be completed accordingly. Note: BSO does not reimburse against this form – the purpose of submission is for monitoring purposes only.

Wholesalers: CDRF1s do not need to be submitted to BSO as CD supplies by wholesalers are monitored using other means.

Further Information:

- <http://www.legislation.gov.uk/id/nisr/2019/208>
- Guidance on the Safe Management and Use of Controlled Drugs
<https://www.health-ni.gov.uk/publications/guidance-safe-management-and-use-controlled-drugs>
- Wholesale Dealer Authorisations (including stock requisitions & controlled drugs)
<https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/cdl-advice-wholesale-dealing040116.pdf>
- Guidance on Private Prescribing of Schedule 2 and 3 CDs for both Stock and Named Patients
<http://www.medicinesgovernance.hscni.net/primary-care/controlled-drugs/private-cds/>

Data Protection Statement: Completed CDRF1s submitted to the BSO will be forwarded to the Health and Social Care Board. This information may be used within the HSC to prevent inappropriate use of controlled drugs and may be disclosed to organisations outside the HSC that have a lawful entitlement to receive it. BSO may retain CDRF1s for up to 6 years.

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Appendix 3

Requisition Requirements

All requisitions must contain the following:

- The name, address, profession / occupation and signature of the recipient
- The purpose for which the stock is required, such as ‘for use in my role as a practitioner’.
- The total quantity of the drug (this does not have to be in words and figures).

Note:

- The name and address of the supplier must be indelibly marked on the requisition. Pharmacists are required to submit the original requisition (not a copy) to the BSO as part of their normal monthly submission. The number of requisitions submitted should be detailed under the “PCD1 & Private Requisitions” section. Pharmacists should also make a copy of the requisition and retain it as part of their records.
- Veterinary requisitions and those relating to inter-pharmacy stock transfers are not required to be submitted to the BSO.

Appendix 4

Prescription Requirements

The Misuse of Drugs Regulations states that prescriptions for Schedule 2 and 3 CDs must contain the following details:

- The patient's full name, address and, where appropriate, age.
- The name and form of the drug, even if only one form exists.
- The strength of the preparation (if more than one strength exists)
- The full dose to be taken. (*NOTE: 'one as directed' is acceptable however 'as directed' is not*)
- Either the total quantity of the preparation in both words and figures of the preparation or the number in both words and figures of dosage units to be supplied or in any other case, the total quantity in both words and figures of the controlled drug to be supplied.
- If supply is intended to start later than the date of the prescription, this should be clearly written on the prescription. The address of the prescriber must be stated on the prescription and must be within the UK.

Note: Pharmacists are required to submit the original PCD1 form (not a copy) to the BSO as part of their normal monthly submission. The number of forms submitted should be detailed under the "PCD1 & Private Requisitions" section. Pharmacists should also make a copy of the PCD1 form and retain it as part of their records