

Dear Colleague

**SAFER MANAGEMENT OF CONTROLLED
DRUGS:
Private Requisition Forms for Schedules 1, 2
and 3 Controlled Drugs**

Action

NHS Boards are asked to:

- **put into effect the arrangements explained in the attached guidance;**
- **distribute a copy of the guidance to doctors, nurse prescribers and all staff involved in the management and use of controlled drugs, including the Board's Accountable Officer. The guidance should also be copied to any private practitioners registered with the Board following the procedures outlined in [NHS HDL \(2006\) 27](#).**

Purpose

The attached guidance explains the procedure for obtaining supplies of private requisition forms CDRF for Schedules 1, 2 and 3 Controlled Drugs. These new arrangements come into effect **from 1 January 2008**.

Yours sincerely

Bill Scott

PROFESSOR BILL SCOTT
Chief Pharmaceutical Officer

Addresses

For action

Chief Executives, NHS Boards
Chief Executive, NHS National Services
Scotland
Chief Executive, Scottish Prison Service

For information

Chief Executive, NHS QIS
Chief Executive, NHS NES
Chief Executive, Scottish Ambulance Service
Board
Chief Executive, National Waiting Times Centre
Board
Counter Fraud Services
NHS 24
Scottish Commission for the Regulation of Care
Royal Pharmaceutical Society of Great Britain,
Scottish Division
SGPC
Community Pharmacy (Scotland)
BDA, Scotland

Enquires to:

Email Enquiries to:
cdenquiries@scotland.gsi.gov.uk

Pharmacy Division
Room 1E.01
St Andrew's House
EDINBURGH
EH1 3DG
<http://www.scotland.gov.uk>

Safer Management of Controlled Drugs (CDs)

Private Requisition Forms for Schedules 1, 2 and 3 Controlled Drugs

Introduction

1. The fourth report of the Shipman Inquiry – “The Regulation of Controlled Drugs in the Community”¹ – made recommendations to strengthen and improve current systems for the management of controlled drugs for human use, whether prescribed and dispensed privately or on the NHS.
2. The Government’s response to the fourth report, “Safer Management of Controlled Drugs”² agreed that the current systems should be improved and strengthened. Since that time amendments to the Misuse of Drugs Regulations 2001 and new governance arrangements introduced in the Health Act 2006 have enhanced and strengthened the audit trail for CDs. For example, in 2006, changes to the Misuse of Drugs Regulations introduced a standard prescription form (PPCD(1)) for the private prescribing of Schedule 2 and 3 CDs. However, many CDs are supplied in the community against private requisitions rather than on prescription. Therefore the new requirements explained in this guidance strengthen the audit trail in respect of Schedule 1³, 2 and 3 CDs supplied in the community against private requisitions.
3. In Scotland, the new arrangements for private requisitions build on the NHS stock order system whereby authorised practitioners obtain supplies of medicines and appliances from community pharmacies for e.g. the immediate treatment of patients. The changes will not apply when supplies are made from other settings such as from hospitals, pharmaceutical wholesalers and manufacturers. Procedures already in place in these organisations are considered to safeguard against the risk of diversion.

Legislative Underpinning

4. A public consultation undertaken by the Home Office on a proposed package of amendments to the Misuse of Drugs Regulations 2001 ended on 6 July 2007. Subject to UK Parliamentary approval, amendments to the regulations governing requisitions will come into force on 1 January 2008. This guidance may require updating at that time.

Requirements

5. Currently no information is collected centrally on controlled drugs supplied in the community against private requisitions. To further strengthen governance arrangements for controlled drugs supplied privately, from 1 January 2008 the name and address of the supplier of all Schedule 1, 2 and 3 CDs must be recorded indelibly on the private requisition and the original form forwarded by the supplier to NHS National Services Scotland (NSS) for analysis. In the case of pharmacy supply, a pharmacy stamp which includes the full name and address of the pharmacy can be used so long as the information is clear and legible. Information derived from these private requisition forms will be made available to NHS Boards and their Accountable Officers for monitoring purposes.

¹ See The Regulation of Controlled Drugs in the Community, The Fourth Report of the Shipman Inquiry (<http://www.the-shipman-inquiry.org.uk/fourthreport.asp>)

² See [Safer Management of Controlled Drugs, the Government’s response to the Fourth Report of the Shipman Inquiry](#)

³ Prescribers cannot normally prescribe schedule 1 CDs without the authority of a Home Office license.

6. For private requisitions a 'standard' form has been designed – CDRF - which will carry the same security features as NHS and private CD prescription forms, including a unique serial number. An example of form CDRF is attached as Annex A. The Misuse of Drugs Regulations already permit such requisitions to be computer generated or handwritten. However, the signature of the person ordering the CDs must be handwritten. In exceptional circumstances, where for example an individual has difficulty accessing the 'standard' CDRF, a CD can be supplied in response to an order written on a non-standard form providing all the legal requirements are met.
7. The current NHS stock order form (GP10A) in use in Scotland already meets the new MDR requirements therefore these arrangements will continue unchanged. However, it is good practice to use a separate GP10A for schedules 1, 2 and 3 controlled drugs.

Arrangements for Obtaining Forms CDRF

8. Those wishing to obtain a supply of CDRFs must register with the local NHS Board as a private prescriber. For those who are not already registered, application forms are available from NHS Boards or can be accessed at www.isdscotland.org or www.psd.scot.nhs.uk
9. Completed application forms will be forwarded by the Board to NSS who will allocate the practitioner with an NSS private prescriber code. Where available, existing NHS prescriber codes will be used. Importantly, if a practitioner works out of more than one practice s/he will require a prescriber code for each practice. NSS will notify the Board of all private prescriber codes.
10. Supplies of forms CDRF can be ordered by the NHS Board from NSS Practitioner Services Division using the PSD Order Form at Annex B. Ordering and invoicing arrangements will be decided by the Board. The Board will invoice the private practitioner or their employer for the cost of supplying the forms. These arrangements mirror those already in place to enable private prescribers obtain supplies of private CD prescription forms.

Processing Dispensed Forms CDRF from 1 January 2008

11. From 1 January 2008, dispensed forms CDRF (originals not copies) must be forwarded to NSS for analysis. Forms dispensed in one month should be submitted by the 5th working day of the following month and should be covered by submission document CD34. Copies of CD34 forms can be obtained from Practitioner Services, 3 Bain Square, Livingston EH54 7DQ (Tel: 01506 705100).
12. Although not a legal requirement, where one community pharmacy supplies another with CDs privately it is good practice for the pharmacy supplying the CDs to submit a written requisition to NSS for processing.

Security & Safe Handling of Prescription Stationery: Good Practice

13. The security of prescription stationery (NHS or private) is the responsibility of the NHS/employing organisation and the practitioner. It is good practice to record the number of the next unused form at the end of the working day. This will help to identify quickly any forms that are lost or stolen. Blank forms must never be pre-signed or left unattended.
14. Practitioners should report a suspected loss or theft of any prescription stationery to the local NHS Board as soon as the loss/theft is discovered. They should report the

approximate number of prescription/requisition forms lost/stolen, their serial numbers and where and when they were lost/stolen. The Board should notify the Fraud Liaison Officer, who is responsible for informing local pharmacists and deciding on the action to be taken. The Fraud Liaison Officer should also notify Counter Fraud Services at the following address:

Counter Fraud Services
Earlston House
Almondvale Business Park
Almondvale Way
Livingston
EH54 6GA

Tel: 01506 705 200
Fax: 08000 15 16 28

FORM CDRF

Private requisition for schedules 1, 2 and 3 controlled drugs

Customer Details

Profession: GP ☐ Dentist ☐ Pharmacist ☐ Nurse ☐ Other
(Please specify)

Name & Main
Employer/Practice
Address

Delivery address if different:

Telephone No:

Prescriber Code:

Signature:

Date of Order:

Item Name & Formulation	Size/Strength	Quantity No. of dose units/volume	Supplied Y/N
1			
2			

NO MORE THAN 2 ITEMS PER FORM

Purpose for which drugs are required - please tick whichever apply

For use within the Scottish Prison Service

☐

For use within Pharmacy

☐

For use within Practice/Surgery

☐

For stock

☐

For use within hospice

☐

For onward distribution within Scotland

☐

Other (please state reason briefly)

Supplier Details

Name of Business	Pharmacy Stamp
Address	
Telephone No	

Contractor Code

09200920

Notes

1. The person raising the requisition (customer) **must** –
 - a. Provide the required information about the controlled drugs to be requisitioned (including strength + quantity).
 - b. If handwritten, complete the form in black biro.
 - c. Indicate the purpose for which the drug(s) is/are required.
2. The person/organisation supplying the controlled drugs (supplier) should –
 - a. Provide their PSD contractor code, name of business, and address.
 - b. Ensure that the customer has completed their relevant sections.
3. The Scottish Prison Service Medical Officers requisitioning controlled drugs for use within the SPS should –
 - a. record MEDACS as their main employer.
 - b. record the address of the prison to which the controlled drugs will be delivered in the delivery address box.

The supplier **must** then submit all CD requisitions to NHS National Services Scotland, using form CD34 which can be obtained from Practitioner Services, 3 Bain Square, Livingston EH54 7DQ (Tel: 01506 705100).

Data Protection Statement

The requisition will be passed to the NHS National Services Scotland for analysis. The information may also be used within the NHS to prevent incorrect usage of controlled drugs, and may be disclosed to organisations outside the NHS that have a lawful entitlement to receive it. This requisition will be confidentially destroyed 24 months after the month in which it was received by NHS National Services Scotland, unless it has been disclosed to another organisation.

PSD PPCD/CDRF Order Form

Order to: Practitioner Services, 3 Bain Square, Livingston EH54 7DQ

Contact Details

Name: Susan Louden

Tel No 01506 705100

Fax No 01506 705191

Email: prescriberstationery@psd.csa.scot.nhs.uk

Prescriber Details

Profession

GP

☐

Dentist

☐

Pharmacist

☐

Nurse

☐

Other (Please state)

Professional Registration No

No of PPCD

Pads

Prescriber Code

No of CDRF

Pads

Prescriber Surname:

Initial:

Prescriber Contact Telephone Number:.....

Main Employer/Practice Address

(Pads will be forwarded here by the NHS Board)

Address for delivery of pads

(i.e. NHS organisation stores or pharmacy department)

Post Code.....

NHS Board Address

.....
.....
.....

NHS Board Name

Post Code:

Signed:Date:

Print Name: Telephone Number: