

NECS supports the NHS England Area Team Controlled Drugs Accountable Officer in ensuring the safe management and use of controlled drugs within the North East & Cumbria region. Based on the commonly reported incidents and the lessons learned, we aim to share good practice across the region

STOP — Can your practice staff also be your patients?

Example 1 — In a call to Medical Protection, a GP partner reported that she had recently joined a practice where the majority of its reception and healthcare assistant (HCA) staff were also registered as patients. This had been the case for years; the staff enjoyed unique access to the appointment system and booked their own appointments when needed.

The GP partner felt uncomfortable with this current arrangement and could foresee situations in which conflicts of interest could arise. The practice was located in an urban area with a number of other surgeries around for staff to register at. However, the partners felt it was unfair to ask the staff to deregister, especially as many of them had been patients for years.

Example 2 — A GP practice reported a receptionist abusing her position and prescribing herself Codeine Phosphate tablets (Controlled Drug) and deleting the issue to avoid being caught.

Advice—Medical Protection. Org

The GMC states in paragraph 16(g) of [Good Medical Practice](#): “In providing clinical care you must wherever possible, avoid providing medical care to yourself or anyone with whom you have a close personal relationship.”

The GMC also states in paragraph 17 of [Good practice in prescribing and managing medicines and devices](#): “Wherever possible you must avoid prescribing for yourself or anyone with whom you have a close personal relationship.”

Both pieces of guidance could be interpreted widely as including work colleagues. It is therefore advisable to adopt a practice policy whereby staff are discouraged from registering as patients, especially if there are other practices available nearby. In this case, the practice was not a rural or isolated practice and there were numerous other local options.

The GP partner was also advised that revising the practice policy would help avoid difficult situations arising in future. With a significant number of staff already registered as patients, the GP partner was also advised to consider the following:

- It may be difficult for GPs to maintain clinical objectivity when treating a colleague, which may in turn subvert the normal doctor-patient relationship.
- There may be situations that could put the doctor in a very difficult position.
- Practices must have a policy in place to ensure that patient confidentiality is maintained at all times and it is advisable that all staff sign a confidentiality agreement and undergo training on confidentiality and data protection
- Any staff members who are registered as patients should not be given preferential treatment in any way, either clinically or administratively.

The GP partner was advised to discuss the risks and considerations outlined above with staff who are registered at the practice in order to encourage staff to register elsewhere of their own accord.

CD DESTRUCTIONS

The team is still continuing to carry out CD Destructions, therefore, please send your requests for authorised witness destructions of schedule 2 CD stock to the appropriate contact (see below). We may contact you prior to the visit to agree COVID-19 safe arrangements. During the visit we will be wearing PPE and would expect the staff to maintain social distancing. CD Destruction request forms are available on our website. [Destruction of CDs and Reporting Incidents - NECS Medicines Optimisation \(necsu.nhs.uk\)](https://necsu.nhs.uk)

Please note in order for a CD Destruction to be carried out on your premises, an up to date T28 Certificate of exemption needs to be obtained from the Environment Agency website. Please find the updated link below or contact Victoria Bennett or Emma Post via the email address below who will gladly send this to you.

T28 waste exemption: sort and denature controlled drugs for disposal - GOV.UK (www.gov.uk)

Pregabalin and Gabapentin dispensing incidents:

Since the rescheduling of pregabalin and gabapentin to a schedule 3 controlled drug, there continues to be frequent dispensing errors, where the wrong product has been given i.e. gabapentin has been dispensed instead of pregabalin and vice versa.

When dispensing these prescriptions please ensure the following:

- Correct product is chosen
- Correct formulation is chosen
- Correct strength is chosen
- All prescription details correspond to the patient by confirming - name, address, D.O.B.

Highlighting the shelves these drugs are stored on and ensuring they are separated will reduce the risk of recurrence.

Use of mandatory CD Requisition Forms (FP10CDF) – It has recently been brought to our attention that some community pharmacies are requesting and supplying items on a **FP10CDF** that shouldn't be included.

A **FP10CDF** form should only be used to requisition schedule 2 and schedule 3 CDs – no other products should be requested on this form. For further guidance on the use of this form please see NHS BSA guidance (<https://www.nhsbsa.nhs.uk/pharmacies-gp-practices-and-appliance-contractors/prescribing-and-dispensing/safer-management>) or on the Home Officer website (<https://www.gov.uk/government/publications/circular-0272015-approved-mandatory-requisition-form-and-home-office-approved-wording>)

If you need advice, or would like an article to be included in a future issue, please contact one of the Controlled Drugs Team Senior Medicines Optimisation Technicians or the CD Liaison Officer:

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