

Managing Controlled Drugs

— taking ownership of the new agenda

By Andrew Alldred, MRPharmS

Guidance on good practice in handling Controlled Drugs in secondary care has recently been published. “Safer management of CDs — a guide to good practice in secondary care (England)”¹ has been produced by the Department of Health and the Royal Pharmaceutical Society in response to the legislative changes introduced by the Health Act 2006 and amendments to the Misuse of Drugs Regulations 2001. It is essential reading for those charged with reviewing and improving CD handling arrangements. It is timely and is likely to be well received.

Of particular importance is that the guidance covers areas of practice that commonly lead to problems with handling CDs — areas in which the law is unclear and so custom and practice have developed over time. These include handling patients’ own CDs, destruction of waste, reconciliation at any point of patient transfer (eg, ward to ward, ward to theatre, ward to home), handling CDs in operating theatres, key-holding and the inclusion of CDs in self-administration schemes.

Experience in many organisations has shown that these are the areas of practice in which problems with CD handling are often found. They should therefore be the focus of any local review.

Another exemplary feature of the guidance is that it takes into account modern medicines management practices such as recognising the prescribing roles of non-medical practitioners

and the supply of CDs through patient group directions.

The guidance also addresses issues of skill mix, covering arrangements such as CD top-up being carried out by pharmacy technicians, senior assistant technical officers or other trained members of pharmacy staff.

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The guidance is clear about the law relating to lines of accountability. While some tasks involving CDs may be delegated, responsibility may not. For example, although a nurse or midwife in charge of a department may be responsible for the safe management of CDs in that area, control of access (ie, key-holding) can be delegated to another member of staff, such as an operating department practitioner (ODP). An ODP may remove CDs on the authority of the nurse or midwife in charge, but legal responsibility remains with the nurse or midwife.

Engagement of the multidisciplinary team is key to successful medicines management and this is

especially true for the safe handling of CDs. This remains a challenge since handling medicines is often seen as purely a pharmacy issue.

Action required

If trusts are to be successful in improving their governance arrangements around safe prescribing, administration and handling of CDs they must take ownership of this agenda. The new guidance reaffirms this principle and is clear about roles and responsibilities of staff and the requirement for competent staff operating under approved standard operating procedures.

Internal audit looks set to be a key tool in complying with the new requirements. This activity provides a useful resource and can generally unearth evidence of substandard practice which then highlights an area for the trust to focus on.

Regular incident review and robust investigation also provide useful tools for learning. Trusts that have already decided to look under the stone, or have done so in response to incidents, complaints or criminal investigations, will know only too well that it is often not until one looks that failures in systems and processes are unearthed. The new guidance will be a useful resource in supporting such review.

It should not be forgotten that the legislative changes outlined in the Health Act were produced in response to the Shipman Inquiry. These aim to reduce the risk of recurrence of the events that led to the incidents and to enhance patient protection while recognising the legitimate and clinically appropriate use of CDs, especially opiates, in the

management of disease. There is a particular focus on the use of CDs in pain control, anaesthesia, treating terminally ill patients, and in the treatment of drug addiction.

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There is much debate as to whether the legislative changes have achieved the balance between access and security and whether they would stop, or even identify, a second Harold Shipman. However, it is clear that the inquiry and subsequent changes in the law have raised the profile of the safe and secure handling of CDs.

The changes introduced by the Health Act and changes to the Misuse of Drugs Regulations are substantial and require all organisations to review fundamentally their systems and processes for handling CDs to ensure they meet the new legal requirements and are fit for purpose. The new guidance will be invaluable in helping them to achieve this, ensuring that safer systems are put into place, which can only enhance patient safety.

References

1. Department of Health and the Royal Pharmaceutical Society of Great Britain. Safer management of Controlled Drugs: a guide to good practice in secondary care (England). London: the stationary office:2007.

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