

What is a Controlled Drugs Accountable Officer?

The aim of this bulletin is to provide background, including relevant legislation, on the role of the HSCB Controlled Drugs Accountable Officer .

Q1. Why do we have an Accountable Officer?

The Controlled Drugs (Supervision of Management and Use) Regulations (Northern Ireland) 2009* were introduced in response to the Shipman Inquiry in order to strengthen the governance arrangements around Controlled Drugs (CD). The Regulations require each designated body, eg Trust, HSC Board, RQIA, to appoint an Accountable Officer (AO) who has overall responsibility for the safe management and use of CDs.

Q2. What is the role of the Regional Controlled Drugs Local Intelligence Network?

The Regional Local Intelligence Network (LIN) is made up of AOs and other representatives from relevant bodies across Northern Ireland eg Trusts, RQIA, NIAS, GMC, PSNI. Each AO is required to share concerns regarding CD management with the LIN. This is so that other agencies who may also be affected are informed of concerns, and that complementary information from these agencies is shared.

Q3. Who is the AO for the HSC Board?

The AO for the HSC Board is Mr Joe Brogan (joe.brogan@hscni.net). He is responsible for ensuring the safe management and use of CDs in primary care which includes the family practitioner services in Northern Ireland—General Medical, General Dental, Pharmaceutical and Ophthalmic Services.



Q4. What specific responsibilities does an AO have?

Ensure CD SOPs in place in each organisation e.g. all practices.

SOPs must include legal and best practice procedures for:

- Storage of, and access to, CDs
- Security of CDs
- Disposal and destruction of CDs
- Who is to be alerted if complications arise
- Record keeping including patient returns
- Prescribing, supply, administration and clinical monitoring of CDs.

Ensure best practice in relation to the management and use of CDs.

This includes arrangements for:

- Monitoring, and alerting the AO of concerns
- Managing untoward incidents
- Maintaining records of, and managing, concerns
- Sharing information - a quarterly incident report must be submitted by each AO to the chair of the Regional LIN
- Ensuring required training is received.

Further Responsibilities of the HSCB AO

- Analyse NHS and private CD prescribing for appropriateness
- Visit premises periodically to physically check CD arrangements. See Q5 and Q6 for further details of how this is managed for community pharmacies and GP practices.
- Request assurances from organisations e.g. GP/dental practices, that appropriate CD procedures are in place e.g. CD self declaration
- Establish and manage the Regional LIN.

Q5. Why is monitoring of CD management by community pharmacies carried out by the DHSSPS Medicines Regulatory Group (MRG)?

The Regulations specify that monitoring of CD management by community pharmacies is carried out by the DHSSPS MRG. Inspection reports are shared with the HSCB AO as set out under a memorandum of understanding (MOU). Relevant information is also shared via the LIN.



Q6. How does the HSCB Pharmacy Team support the work of the AO?

Examples of ongoing work to support the AO role	
<p>Quarterly monitoring of NHS and Private CD prescribing by GPs, Dentists, Non Medical Prescribers eg traffic light reports in GP COMPASS reports</p>	
<p>Guidance on Developing a CD SOP for Primary Care Prescribers plus separate Summary Guidance</p>	
<p>CD Self Declarations received from GP practices, OOHs, Dentists and Community Pharmacies</p>	
<p>Newsletters/FAQs sharing learning from incidents involving CDs and providing clarification in response to queries regarding legal/best practice requirements for managing CDs.</p>	
<p>Training for prescribers on the safe management and use of CDs</p>	
<p>Regional Controlled Drug Record Card (CDRC) for monitoring CDs administered by community healthcare Staff.</p>	
<p>CD Management Visits/Inspections of GP practices</p>	
<p>CD Reconciliation Project—wholesale supplies into pharmacies are reconciled against HSC supplies out of pharmacies. Any outliers are identified for follow-up</p>	

Further guidance on the role of the AO for Controlled Drugs, and the Safe Management of CDs in Primary Care, can be found at: <http://www.medicinesgovernance.hscni.net/accountable-officer/>

*Amendments to the The Controlled Drugs (Supervision of Management and Use) Regulations (Northern Ireland) 2009 are outlined in [The Controlled Drugs \(Supervision of Management and Use\) \(Amendment\) Regulations \(Northern Ireland\) 2015](#)