Guidance on Private Prescribing of Schedule 2 & 3 CDs for both Stock and Named Patients

Background
The majority of Schedule 2 and 3 CD prescribing by health practitioners will be carried out under the NHS; however there may be occasions when private prescribing is required for either stock and/or named patients. The process to be followed for each type is outlined below.

Private CD Stock Prescribing (Stock Requisitions)

Private CD stock may be required by a range of healthcare professionals for use in their practice. Some 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.

Private CD stock requisitions should be made using headed notepaper and written in line with CD requisition requirements. See Appendix 1.

Private CD Patient Prescribing (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 NHS 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 and tramadol) must be written on a standard private prescription form i.e. PCD1 form and the prescription should be written in line with CD prescription requirements. See Appendix 1. 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 NHS arrangements on an NHS 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 stock 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 Business Services Organisation website http://www.hscbusiness.hscni.net/services/2272.htm. Practitioner guidance and associated resources are also available at this link: 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.

3. In the event that further forms are required, applicants should reapply using this same process as for the initial supply of PCD1 forms.

Appendix 1

Schedule 2 or 3 CD Legal Requirements

Stock Requisitions
The following 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 drugs may be possessed by the 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 DHSSPS, who are engaged by and under the control of the Northern Ireland Ambulance Service HSC Trust
- Private paramedics – those operating outside NIAS engagement and control who possess the relevant licence issued by DHSSPS

Requisition Requirements

A requisition which complies with Misuse of Drugs Regulations (Northern Ireland) 2002 is required before supplying or obtaining Schedule 2 or 3 CDs. Requisitions for Schedule 2 and 3 controlled drugs have to be in writing - either computer-generated or handwritten. Requisitions that are handwritten do not need to be in the recipient’s own handwriting. The recipient must sign requisitions irrespective of the means of production.

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 requisitions (not a copy) to the BSO.
Prescription Requirements

The Misuse of Drugs Regulations 2002 states that a prescription for Schedule 2 and 3 CDs (with the exception of temazepam and preparations containing it) 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.