

Changing the intervals of instalments for controlled drugs during a pandemic

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Changes to controlled drug legislation ^{1 2} give Ministers in Great Britain and the Department of Health in Northern Ireland the option to switch on additional flexibilities during a pandemic to allow pharmacists to change the intervals of instalments without a new prescription, following agreement with the prescriber or their appointed representative.

These are contingency changes which will only be 'activated' by an announcement by a Secretary of State which specifies:

- When the change comes into effect
- How long the change is effective for, and
- The geographical area this change applies to. This could be national, regional or specific to a local area.

Action should be taken only in accordance with national operational guidance which will be issued in each of the home countries before the enabling changes are needed.

This guide has taken into account correspondence between the Home Office and the Advisory Council on the Misuse of Drugs and applies across the United Kingdom.

1 [The Misuse of Drugs \(Coronavirus\) \(Amendments Relating to the Supply of Controlled Drugs During a Pandemic etc.\) Regulations 2020](#)

2 [The Misuse of Drugs \(Amendment\) Regulations \(Northern Ireland\) 2020](#)

Introduction

During the current pandemic there is a need to mitigate against the risk of unexpected closures of pharmacies and/or GP practices and Alcohol and Drugs Prescribing services which could result in interruptions in the supply of medicines prescribed on instalment prescriptions for controlled drugs (CDs), including opioid substitution therapy (OST).

Steps have been taken in most areas to reduce the workload on Prescribing services, GP Practices and community pharmacy services and manage social distancing by reducing the frequency of instalment "pick up" and supervised consumption instructions. Prescribers should have appointed a representative to make decisions on their behalf as part of contingency plans.

Pharmacy OST services provide the most frequent contact and are recognised as an essential part of recovery and harm reduction for individuals and the wider community.

Instalment direction framework before changes

See [Medicines, Ethics and Practice](#) for existing legal requirements for instalments, including amount, interval and flexibilities.

Instalment direction framework after changes

Legislation has been amended, informed by the advice of the [Advisory Council on the Misuse of Drugs](#), to enable pharmacists to vary the frequency of the supply of Schedule 2 and 3 CD instalments, without the need for a further prescription. Pharmacists can ONLY make this change with the agreement of the prescriber or their appointed representative. They will NOT be able to change the frequency of the instalments if the prescriber or their appointed representative cannot be contacted.

These powers would only be used if demand pressures and workforce illness/self-isolation during the pandemic meant that local health services were at imminent risk of failing to fulfil their duties. These measures aim to ensure that pharmaceutical services will continue to be able to deliver the best possible care and to protect the lives of the most vulnerable members of society.

These changes are enabling and will be actioned only after the Secretary of State switches on this measure. The changes:

- Are effective for a period of three months
- Can be extended if required by a further three-month period at a time
- Can be withdrawn any time
- Apply to defined geographical areas that could cover all or part of the UK

The criteria for supply under the temporary changes are the supply must be:

- By a registered pharmacy regulated by GPhC and PSNI
- it does not apply to continuation of supply on a private prescription
- Subject to a discussion and agreement with the prescriber or their appointed representative.

Scope of guide

This guide applies to people who are receiving instalment prescriptions for Schedule 2 and 3 CDs including those who are receiving opioid substitution therapy (OST), supervised or pick up only.

Circumstances when a pharmacist might vary instalment timings and amount

INCREASING THE TIME BETWEEN PICK UP

- When the person receiving an instalment needs to self-isolate or be shielded and a representative is not available to collect on their behalf.
- If the pharmacy needs to close or staff shortages affect the ability to maintain services. In this circumstance pharmacists must notify NHS England and NHS Improvement, NHS Boards contracting services or Local Authority (LA) commissioners in the usual way.
- If the GP practice or treatment service needs to close or staff shortages affect the ability to maintain service.

DECREASING THE TIME BETWEEN PICK UP

- Where the time between "pick ups" had been increased by the prescriber and the person is showing chaotic or harmful behaviour.
- If there is evidence that the individual is at risk of physical harm or of their medicines being diverted
- If the person cannot secure large volumes of CDs, especially OST safely at home e.g. two people prescribed OST living in the same home or their home situation becomes unstable.

Professional considerations

This measure is enabling and a risk assessment should inform your professional judgement, discussions and decision. Pharmacists need to be aware of actions already taken by Alcohol and Drug services and prescribers in their area ([England](#), [Scotland](#), [Wales](#), [Northern Ireland](#))

Decisions are best made on an individual basis, based on the pharmacist's knowledge of the person, clinical [guidelines](#), and discussed with the prescriber or their appointed representative, after the measure has been enabled by the Secretary of State.

Risk assessment

Must include discussions with the person and prescriber or their representative to prevent drug related deaths and harm to identify;

- Adults taking OST with a chaotic lifestyle and or home situation who may need frequent contact and will not be able to securely store OST at home.
- Safeguarding issues for children and vulnerable adults where safe storage may be an issue. See NICE Safe Storage [Guideline](#)
- The person's risk of diverting the supply to buy illicit drugs resulting in relapse and possible overdose in others or themselves.
- The possibility of physical harm and theft of the CD from the individual.
- People with dual diagnosis with severe and enduring mental health issues with additional care needs that require frequent contact with the pharmacy team to maintain their stability.
- Risk of drug related death or non-fatal overdose, especially if the person has recently been released from prison. [Clinical Guidelines on Drug Misuse and Dependence Update 2017 Independent Expert Working Group, 2017],

If prescriber/prescribing service or their appointed representative are not available

Pharmacists cannot vary the instalment interval under this measure and should notify the CD Accountable Officer and commissioning/contracting service.

Varying the instalment/amount

Time between intervals can be increased or decreased depending on the circumstance and should be time limited; the longer the interval the higher the risk. This is best done in line with discussion with prescriber and UK guidelines on clinical management ([2017](#))

Best practice and responsibilities of the pharmacy team

- Liaise with prescribing services
- Advising on safe storage arrangements in the person's home.
- Take home doses should always be supplied in individual bottles.
- Good CD governance and standard operating procedures should still be followed.
- Any missed doses or concerns should be documented and escalated via normal process. This will include informing the prescribing service, the local lead NHS controlled drugs accountable officer as well as completing any internal records/monitoring form that may be needed.
- Update phone numbers for people receiving instalment prescriptions for CDs to enable any communication required where available

Supervision is not a legal requirement, however, for some individuals daily or reduced supervision may still be essential. If the pharmacy is unable to provide OST supervision, notify the prescribers, local NHS England and NHS Improvement teams, NHS Boards or Local Authority Commissioning Services to ensure services are aware and able to further risk assess. This may include finding an alternative pharmacy for these individuals.

Record keeping

The supply should be recorded in the CD register as usual with the addition of word "pandemic exemption". The circumstances and risk assessment for the decision and a detailed note of discussions should be recorded in the prescription only register to allow this to be referenced and recalled later.

See national guidance for further information.

Alcohol and Drug Prescribing services

Generic term used in this guide to describe substance misuse services providing OST in different specialist or primary care settings across UK.

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