

Home Office Consultation: Proposed Consolidation of the Misuse of Drugs Regulations 2001

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the educational, ethical and clinical standards of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.
2. The RCVS does not seek to comment on all of the proposals in the consultation document and will limit its comments to those areas where there are clear indications of relevance to the College's role. More specifically, the primary focus of the College's response relates to proposals to amend Regulation 15(1)(ab) to make it a requirement for veterinary surgeons to include their Royal College of Veterinary Surgeons number on prescriptions for Schedules 2 and 3 controlled drugs except temazepam. The College does, however, note its support of the Government's preferred policy option, to consolidate the Misuse of Drugs Regulations 2001 (as amended) and to use the opportunity to additionally amend specific provisions to reflect current policy on controlled drugs.

Inclusion of RCVS number on prescriptions for Schedules 2 and 3 drugs

3. The RCVS is strongly supportive of the proposal to bring veterinary prescriptions in line with the human healthcare sector and the recommendations of The Shipman Inquiry, by making it mandatory for veterinary surgeons to include their Royal College of Veterinary Surgeons number on prescription for Schedules 2 and 3 controlled drugs except temazepam. Furthermore, the RCVS notes that the Veterinary Medicines Directorate's Veterinary Medicines Guidance Notes already maintain that it is 'good practice to add the prescribing veterinary surgeon's Royal College of Veterinary Surgeons (RCVS) registration number' when prescribing Schedule 2 and 3 controlled drugs except temazepam. The British Veterinary Association recommends that veterinary surgeons should add their RCVS number to all written prescriptions.
4. The RCVS primarily supports the proposal on the grounds that it will improve the ability to monitor the sector and to increase the ability to collate data on the individual prescribing activity of veterinary surgeons. With the emergence of internet pharmacies, the RCVS also welcomes the introduction of any measures that will serve to identify correctly the provenance of all veterinary prescriptions and to reduce the potential for fraud.
5. The RCVS considers that there is scope to improve the systems in place for monitoring veterinary prescriptions. The RCVS notes that the systems in place to monitor prescriptions in the human health care sector are more robust than those covering veterinary prescriptions and that there may be examples of best practice that could be taken from the human sectors and used to improve the monitoring of veterinary prescriptions. To this end, the RCVS would request more information as to how effective the monitoring of human prescriptions has been, since the implementation of the

majority of the Shipman Inquiry Recommendations and the extent to which fraud is thought to occur and is prevented by the systems in place.

6. In relation to this proposal, the RCVS agrees with the Home Office Impact Assessment that the additional costs to veterinary surgeons are likely to be negligible. Including the prescribing veterinary surgeon's RCVS number on a hand-written prescription will take very little extra time and we understand only minimal changes are likely to be required in those practices operating computerised prescription systems. Furthermore, many veterinary surgeons will already be including their RCVS number on such prescriptions as a matter of good practice.
7. Whilst strongly supporting the proposals, the College does, however, sound a note of caution regarding the reduction of fraud that the inclusion of the RCVS number on prescriptions might bring. This is because when doctors write prescriptions they use a unique number that identifies the doctor writing the prescription, their practice and their Primary Care Trust. A veterinary surgeon's RCVS number, however, is a publically available number, similar to a doctor's GMC registration number. Thus, whilst the inclusion of an RCVS number on prescriptions for Schedule 2 and 3 drugs creates an extra precaution against fraudulent prescriptions, it does not completely alleviate the potential problem. The addition of a veterinary surgeon's RCVS number on a prescription does, however, serve to assist the pharmacist or dispensing veterinary surgeon to identify the prescribing veterinary surgeon and to make the appropriate checks as to the provenance and accuracy of the prescription.

Improving pharmacovigilance

8. Whilst it is beyond the scope of this consultation exercise, the College would like to take this opportunity to reaffirm its support for the introduction of a system whereby prescribing veterinary surgeons are provided with information from pharmacies that allows them to make checks to ensure that the animals under their care are provided with the correct drugs and that all prescriptions, whether controlled or otherwise, that they write are being fulfilled and collected. Such a system would serve to improve the collection of data on adverse reactions as checks could be made on the precise drugs that were issued to the client, the quantity of medicine issued and whether the prescription was collected and by whom. Such a system would also serve to bring veterinary surgeons' prescriptions further in line with those of human healthcare providers, and the systems that are already in operation for prescription medicines for human use.
9. If you require clarification on the above comments, please do not hesitate to contact me. Alternatively, representatives from the RCVS would be happy to meet you to discuss and expand upon our position.