

VMD: Information gathering exercise on the misuse of veterinary prescriptions

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 commends the efforts of the VMD to investigate the true extent of the problem of the forgery and tampering of veterinary prescriptions. The RCVS considers it is imperative that the true scale of this problem is understood so that any proposals for the imposition of control measures will then be based on facts, and not anecdotal reports.

Evidence from RCVS Professional Conduct Department

3. Since April 2010, the RCVS Professional Conduct Department has recorded four incidents of advice provided to veterinary surgeons or practices receiving fraudulent or tampered veterinary prescriptions:
 1. Advice was given to a veterinary surgeon regarding a fraudulent prescription.
 2. Advice was given to a pharmacist who received a prescription that had been signed by someone purporting to be an MRCVS who was not.
 3. Advice was given to a practice where a client had presented a prescription for a drug having changed the date on the prescription.
 4. Advice was given to a practice about a client who had forged a veterinary surgeon's signature to submit a fraudulent prescription to an online pharmacy.
4. It is important to note, however, that the RCVS does not hold statistics on fraudulent prescriptions by non-veterinary surgeons and that this is an area that will be important for the VMD to consider when assessing the need for additional control measures.

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

5. In response to the 2011 Home Office consultation on the proposed consolidation of the Misuse of Drugs Regulations 2001, the RCVS expressed strong support for 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 RCVS number on prescriptions for Schedules 2 and 3 controlled drugs except temazepam.
6. The RCVS noted 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. Furthermore, the British Veterinary Association recommends that veterinary surgeons should add their RCVS number to all written prescriptions.

7. The RCVS primarily supported this proposal on the grounds that it would serve to improve the ability to monitor the sector and to increase the ability to collate data on the individual prescribing activity of veterinary surgeons.
8. The College sounds a note of caution, however, 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 would, however, assist the pharmacist or dispensing veterinary surgeon in identifying the prescribing veterinary surgeon and making the appropriate checks as to the provenance and accuracy of the prescription.
9. The RCVS considers that there is still scope to improve the systems in place for monitoring veterinary prescriptions and to assist in the prevention of fraud. The RCVS notes that the systems currently 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.
10. With the emergence of internet pharmacies, the circumstances under which it is acceptable to supply against a electronically transmitted or faxed prescription should be clarified and suppliers should be required to have, or be sure that they will receive, the original document before fulfilling the prescription.
11. 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.

Improving pharmacovigilance

12. Whilst it is beyond the scope of the current VMD evidence gathering 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 which they write, whether for controlled drugs or otherwise, are being properly 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.
13. If clarification on the above comments is required, please do not hesitate to contact the College. Representatives from the RCVS would be happy to meet with officials to discuss and expand upon this evidence.