

Appendix One: Private Controlled Drugs Frequently Asked Questions

Q1. Can I dispense a private prescription for Schedule 2 & 3 CDs written on headed note paper e.g. temazepam?

No. All Schedule 2 and 3 CDs including temazepam must be prescribed on a PCD1 form or equivalent.

Q2. I have received a PCD1 for a Schedule 2 CD. The date is missing. Is it acceptable for this to be added by the pharmacist?

No. A pharmacist is **not** allowed to dispense a Controlled Drug unless all the information required by law is given on the prescription. In the case of a prescription for a Controlled Drug in Schedule 2 or 3, a pharmacist can amend the prescription where the total quantity of the preparation of the controlled drug or the number of dosage units as the case may be is specified in either words or figures but not both (i.e. they are permitted to add the words or the figures to the controlled drug prescription if they have been omitted) or if it contains minor typographical errors, provided that such amendments are indelible and clearly attributable to the pharmacist (e.g. name, date, signature and registration number) see [BNF](#) for further information.

Q3. I have received a private prescription for a Schedule 2 CD from a private clinic in London. Can I dispense it?

Yes. The prescription can only be dispensed if it is on a PCD1 equivalent (e.g. FP10PCDSS) meets all the legal [requirements](#) (see MRG letter 2022 [Private prescribing and prescription requirements](#)) and is clinically appropriate. Controlled drugs in Schedules 2, 3 and 4 are valid for 28 days from the appropriate date whilst those in Schedule 5 are valid for 6 months from the appropriate date.

NOTE: The prescription **should not be dispensed if the prescriber cannot be verified** and if there are doubts over the prescription's authenticity. The patient should be signposted to appropriate services as necessary.

Q4. Can a pharmacist dispense an EEA (European) prescription for tramadol?

No. Pharmacists **cannot** dispense a private prescription for a Schedule 1, 2 or 3 CD **if the prescriber's address is outside of the UK.** for further information MRG letter 2022 [Private prescribing and prescription requirements](#)

Q5. Can I dispense ANY medication from a printed copy of an electronic prescription?

No. The Human Medicines Regulations 2012 make provisions for electronic prescriptions. A printed copy of an electronic prescription may not be considered a prescription in a similar way that a photocopy or fax of a paper prescription may not be considered a prescription.

Q6. Who can order stock using a CDRF1 form?

- Individual practitioners e.g. doctors, dentists and vets for non-Health Service purposes
 - Private hospitals/clinics where there is no on-site pharmacy
 - Private paramedics operating outside NIAS engagement and who possess the appropriate licence issued by the Department of Health
 - Others as required by legislation e.g. owner or master of a ship, or persons in charge of a laboratory.
- Note:** Non-medical prescribers e.g. nurse and pharmacists are not permitted to hold personal supplies of CD stock or to sign CD stock requisitions (HS21S or CDRF1 forms)

Q7. Can I supply stock for Schedule 2 & 3 CDs written on headed note paper e.g. midazolam from a dentist?

No. Schedule 2 or 3 private CD stock must only be supplied against a fully completed CDRF1 form.

Q8. Can a messenger be used to collect CD stock?

Yes. In exceptional cases where it is necessary for Schedule 2 or 3 CDs to be collected by a messenger on behalf of the practitioner the messenger must:

- Give the pharmacist a written statement, signed by the practitioner, indicating that he/she may receive the drugs
- The messenger must deliver the CDs directly to the practitioner who has placed the order

Q9. Who can order stock for a practice?

Requisitions for private hospitals/clinics **MUST be COUNTERSIGNED BY A DOCTOR (OR DENTIST)** employed there if the CDRF1 form is completed by the person in charge or acting person in charge of the private hospital/clinic.



Supplement: Private Controlled Drugs – Information for Community Pharmacists

Private Prescription Forms (PCD1)

In Northern Ireland, a PCD1 prescription form **MUST** be used if a prescriber (including dentists and non-medical prescribers (NMPs) needs to prescribe a Schedule 2 or 3 CD (including temazepam) in a private capacity for a named patient.

Reminder Private CD Prescription Requirements

The Misuse of Drugs Regulations states that prescriptions for Schedule 2 and 3 CDs must contain the following details:

- The patient's full name, address and age if under 12
- 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 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 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 CD 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
- Dated and signed by the person issuing it with their usual signature. If issued by a dentist, the words 'for dental treatment only'.
- Specify the prescriber identification number of the person issuing it

NOTE: Prescribers must complete an application form to obtain PCD1 forms for further information see [Controlled Drugs - HSC \(hscni.net\)](#).

Private Stock Requisition Forms (CDRF1)

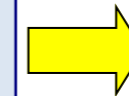
In Northern Ireland, if Schedule 2 or 3 CD stock is required by individual practitioners for private purposes, a CDRF1 **MUST** be completed. Notes to aid completion of the CDRF1 can be found [on the reverse of the form](#).

Reminder Private CD Stock Requisition Requirements

All requisitions must contain the following:

- The name, address (where CDs may be used), 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.

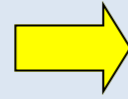


Submission to BSO

All original private Schedule 2 or 3 CD prescriptions and stock requisitions must be submitted to BSO in a timely way, ideally by the end of the month in which they were received. This also applies to all private prescription forms for Schedule 2 or 3 CDs, PCD1s and equivalent forms from outside Northern Ireland e.g. FP10PCD.

Section O of the HS30 submission form has provision to allow for these forms to be included in BSO submissions. It is recommended that a copy of the CDRF1 and PCD1/equivalents for Schedule 2 and 3 CDs is retained in the pharmacy.

EXCEPTIONS: private prescriptions for Schedule 4 and 5 CDs, inter-pharmacy stock transfers and requisitions written by veterinary practitioners must not be submitted to BSO - they must be retained in the pharmacy and drawn to the attention of the pharmacy inspectors during routine inspections.



Private Prescription Forms from Other Regions in the UK	Private Prescription Forms for Patients Residing Outside the UK
<p>Pharmacists asked to dispense prescriptions for CDs issued by prescribers in other regions within the UK must ensure the prescription:</p> <ul style="list-style-type: none">Meets legal requirements as set out in the Human Medicine Regulations 2012 and Misuse of Drugs Regulations (Northern Ireland) 2002.Is on the PCD1 equivalent for schedule 2 and 3 CDs e.g.FP10PCD <p>Note: the UK does not include the Channel Islands or the Isle of Man)</p>	<p>Community pharmacists may be aware that a patient lives outside of the UK, e.g. Dublin.</p> <p>Patients travelling out of the UK, either to their home or for other purposes with Schedule 2, 3 and 4 CDs should be advised to contact the relevant authorities in each country for advice on the legal requirements regarding movement of CDs to and from the UK.</p>

Private Prescription Forms from Prescribers outside UK

Pharmacists **CANNOT** dispense a CD listed in Schedule 1, 2 or 3 of the Misuse of Drugs Regulations (Northern Ireland) 2002, if the prescriber's address is outside of the UK. The address of the prescriber must be in the UK. For further information see MRG letter 2022 [Private prescribing and prescription requirements](#).

Online Prescribing Platforms

GMC "Good Practice in Prescribing" advises that prescribers must not prescribe CDs unless they have access to relevant information from patients' medical records ([Good practice in prescribing and managing medicines and devices - ethical guidance summary - GMC \(gmc-uk.org\)](#)). Prescribing remotely must be done in a manner that ensures appropriate safeguards are in place to support patient safety and safe prescribing.

Both the [Pharmaceutical Society of Northern Ireland \(PSNI\)](#) and the [General Pharmaceutical Council \(GPhC\)](#) have issued guidance on internet pharmacy and distance supply models respectively (see links). [A letter co-issued by the Controlled Drugs Accountable Officer and Medicines Regulatory Group](#) in February 2022 highlighted the governance risks relating to the operation of online prescribing platforms and the subsequent dispensing of medicines from associated pharmacies. Community pharmacies were asked to advise the Accountable Officer (AO) if they had dispensed any controlled drug medicines (Schedules 2-5) arising from any online prescribing platform prescriptions from 1st January 2021 to 23rd February 2022.

Suspected Fraudulent Prescriptions for CDs

Pharmacists are reminded that when supplying medications they must exercise due diligence to satisfy themselves that the prescription is genuine and from a practitioner authorised to prescribe or requisition CDs. This is particularly relevant when dispensing medicines liable to abuse/misuse, against private prescriptions and private stock requisitions, including CDs Schedules (2–5).



All confirmed instances of false prescriptions should be reported, firstly to the PSNI on 101 (or 999 in the case of an emergency) and also to BSO Counter Fraud & Probity Services (see <https://cfps.hscni.net/report/>), regardless of whether medication was obtained or not.

Prescribers Prescribing for Themselves or for Family Members

GMC guidance on Prescribing for yourself or those close to you states, 'You **MUST NOT** prescribe CDs for yourself or someone close to you unless no other person with the legal right to prescribe is available to assess and prescribe without a delay and emergency treatment is immediately necessary to avoid serious deterioration in health or serious harm.'

Pharmacists should remind doctors of this before supply. For further information see GMC guidance [Good practice in prescribing and managing medicines and devices - ethical guidance summary - GMC \(gmc-uk.org\)](#).

Record Keeping

Pharmacies must keep appropriate records of private transactions involving all schedules of CD and these must be retained in the pharmacy.

Schedule 2 and 3 prescriptions should be endorsed with the date of supply at the time of supply.

All private prescriptions or requisitions for Schedule 4 or 5 CDs must also be retained in the pharmacy in accordance with regulation 253 of the Human Medicine Regulations 2012.



Reporting CDs Incidents

In accordance with [guidance](#), the DoH CDAO must be notified of any controlled drug issues that occur in any area of primary care, including private practice by email to: ControlledDrugsAccountableOfficer@health-ni.gov.uk.

A dedicated page on the [DoH website](#) has been created in order to keep all personnel informed of any changes as a result of the CDAO role transferring to DoH. Please continue to ensure that CD incidents are also reported to the Pharmacy Inspectors at: mrg_inspectors@health-ni.gov.uk

Medicines Management Team contact details

This newsletter has been produced for community pharmacists and pharmacy staff by the Regional Pharmacy and Medicines Management Team. Previous editions of the newsletter can be found at: [Pharmacy Regional News – 'PRN' | NI Formulary \(hscni.net\)](#)

If you have any queries or require further information on the contents of this newsletter, please contact one of the Pharmacy Advisors in your local SPPG office:

Belfast Office: 028 9536 3926 Southern Office: 028 9536 2104 Northern Office: 028 9536 2845
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