

NHS GGC Medicines Governance Processes during Covid-19 pandemic

Background

- Due to significant pressure on all services from the Covid-19 pandemic, NHS GGC Area Drug
 and Therapeutics Committee (ADTC) has cancelled its meetings for the next few months. A
 small ADTC exec team will continue to consider any relevant business requiring its input on a
 case by case basis and will consult the committee members remotely where necessary.
- The work of the Scottish Medicines Consortium has been paused due to the pandemic and as a result we will not be adding medicines to the formulary unless deemed essential.
- NHS GGC have put in place a governance structure to manage the response to the current situation. There is a process for approving guidelines via the Acute Tactical Group delivered via Clinical Governance Department. Any guidelines including medicines advice will be routed via the Area Drug and Therapeutics Executive Team prior to approval (Appendix 1). Members of the ADTC may be asked to comment in some circumstances. The main points for the ADTC exec team are consideration of the following
 - Has there been appropriate consultation prior to submission?
 - Are there any significant differences with or implications for current guidelines?
 - IS there a clinical risk in adopting the COVID19 guidelines if there is a difference with current guidance?

Guidance, once approved and if it is considered to meet existing Handbook content principles, will be uploaded onto a COVID19 part of the Therapeutics Handbook.

- ADTC Subcommittees are not expected to meet, but will continue to work virtually where necessary.
- To provide some flexibility and ensure appropriate clinician engagement, the ADTC Executive membership is being expanded to cover the pandemic period.

PACS/ULM/IPTR Requests

The processes for accessing medicines not approved for use in NHS Scotland and for unlicensed medicines remain in place. During this period, the Chiefs of Medicine may employ more use of remote/Teams discussions than done previously.

There is ongoing discussion with the Directors of Pharmacy to support medicines governance across Scotland, including for national switches and decisions for cancer medicines.

Controlled Drug Governance Processes

Processes to ensure controlled drug governance are continuing. Queries are being dealt with as usual. The following processes are continuing:

- Provision of expert legal, ethical and clinical advice to clinicians and managers in relation to the use of controlled drugs, particularly in novel situations arising from COVID-19
- Ensuring that Pharmacy Services meets statutory requirements in relation to CDs advice to healthcare professionals, leads, DoP and others
- Providing advice to ensure that pharmacy legislation (Medicines Act, Misuse of Drugs Act and relevant European legislation) and good practice guidance (national and local) is adhered to
- Provision of expert legal, ethical and clinical advice to clinicians and managers in NHSGGC prisons and police custody suites around use, procurement, supply and administration of medicines and CDs within prisons and police custody suites across NHSGG&C

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- Datix incidents and community pharmacy incident reports continue to be reviewed
- National collaborative working is continuing through virtual networks.

The following additional activities have been initiated in response to COVID-19:

- Providing CD Governance input to Pharmacy Services leads involved in the NHS Louisa Jordan field hospital
- Supporting the Accountable Officer Executive and its partner organisations to produce guidance and updates for clinicians, contractors, and relevant services within NHSGGC on legislative changes, particularly in relation to contingencies around COVID-19

The following processes are amended:

- GP prescribing reviewing has been suspended; no face to face meetings or physical checks are happening
- No CD destructions are currently taking place, unless delaying the destruction poses a risk
- Routine monitoring of reports (including NMP prescribing of CDs, private CD prescribing, monthly stock orders, HBP prescribing) with reduced frequency
- Inspection visits to all sites (hospitals, prisons, police custody suites) have been suspended
- Non-urgent investigations relating to incidents, linking with police officers, regulatory bodies and NHS Counter Fraud Services have been temporarily halted
- Work with Health Improvement Scotland and other organisations has been postponed

Interim governance relating to cancer medicines for adults during COVID-19

The COVID-19 pandemic changes the balance of benefit to risk for patients receiving systemic anticancer therapy (SACT) and will impact on workforce available to deliver services in NHSGG&C.

With an urgent need to review prescribing practice in order to address the impact of the pandemic, a COVID-10 National Cancer Medicines Advisory Group (COVID-19 NCMAG) working within a national framework, will be set up. This will allow a consistent approach to decision making on cancer medicines for groups of patients in the context of COVID-19.

The national framework, which sets out the principles and process under which the COVID-19 NCMAG will operate is accessible via the Scottish Government website (click here).

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Appendix 1

