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Bwrdd Iechyd Prifysgol  
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Health Board



<b>Meeting Date</b>	<b>25 October 2022</b>	<b>Agenda Item</b>	<b>4.5</b>
<b>Report Title</b>	Controlled Drug Governance and Assurance (Progress Report)		
<b>Report Author</b>	Rhys Howell (Advanced Pharmacist – Governance, Improvement and Transformation)		
<b>Report Sponsor</b>	Judith Vincent (Clinical Director for Pharmacy & Medicines Management & Controlled Drugs Accountable Officer)		
<b>Presented by</b>	Rhys Howell (Advanced Pharmacist – Governance, Improvement and Transformation)		
<b>Freedom of Information</b>	Open		
<b>Purpose of the Report</b>	This paper provides a progress report on the strengthening of controlled drug governance arrangements across the Health Board in line with the approach agreed at Senior Leadership Team on the 5 <sup>th</sup> November 2020.		
<b>Key Issues</b>	The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008 place a statutory responsibility on the Health Board and its Controlled Drug Accountable Officer to ensure the safe management and use of controlled drugs. As previously agreed with the Senior Leadership Team in early 2019, controlled drug governance requires strengthening across the Health Board in order to provide the necessary assurance regarding compliance with this legislation.		
<b>Specific Action Required</b> <i>(please choose one only)</i>	<b>Information</b>	<b>Discussion</b>	<b>Assurance</b>
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Recommendations</b>	Members are asked to receive this progress report detailing the actions taken to strengthen controlled drug governance across the Health Board.		

## **Controlled Drug Governance and Assurance (Progress Report)**

### **1. INTRODUCTION**

The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008 place a statutory responsibility on the Health Board and its Controlled Drug Accountable Officer (CDAO) to ensure the safe management and use of Controlled Drugs (CDs). It has been identified by the CDAO that CD governance needs to be strengthened across the Health Board in order to provide the Board with the necessary assurance regarding compliance with this legislation. This paper documents progress made to date.

### **2. BACKGROUND**

As discussed in previous update papers, agreement was sought and received from the Health Board Senior Leadership team in November 2020 to work with Service Groups to strengthen CD governance through a 3-phased approach:

- **Phase 1:** Service Group sign up to a 'Controlled Drug Governance and Assurance Charter' to outline commitments by the Service Group to strengthen CD governance in key areas including the creation of a senior Service Group CD lead.
- **Phase 2:** Six monthly CD governance and assurance meetings held between the Service Group CD lead and CDAO.
- **Phase 3:** Development of a Service Group CD Management and Assurance Plan.

The intention of this methodology was to provide a flexible and practical structure via which Service Groups could make improvements alongside severe service pressures caused by the COVID-19 pandemic. Through a mixture of short-term actions and long-term planning, Service Groups would be enabled to strengthen CD governance commensurate with the nature of CD management undertaken together with any controls already in place. Progress in terms of implementation of the 3-phased approach objectives can be found in figure 1.

		NPT/S	Morriston	PCT	MH&LD
Phase 1	CD Charter	Signed	Signed	Signed	Signed
	CD Lead	Dr Martin Bevan	(Dr Gordon Staple)*	Karl Bishop	Dr Richard Maggs
Phase 2	6 monthly meetings between CDAO and CD Lead	Completed 28/06/22	Completed 07/04/22	Completed 06/06/22	Completed 13/06/22
Phase 3	CD Management and Assurance Plan	Plan Developed	Plan Developed	Plan Developed	Plan Developed

**Figure 1:** 3 phase approach implementation dashboard. (\* Awaiting notification from Service Group regarding new CD Lead - Dr Gordon Staple changing roles within Morriston Service Group - May 2022).

Both the inaugural 6 monthly meetings held between the CDAO and Service Group CD Leads (Autumn 2021) and the subsequent round of meetings during Spring 2022 were helpful for the CDAO to gain an indication of progress, any outstanding concerns and current degree of assurance around CD governance.

These meetings have identified a need to better support staff to understand the key requirements of Health Board CD policy. In response, the CDAO agreed to commit resource to support the design and production of an education package and quick reference guides for the 'Pan-Health Board' elements of CD management. Service Groups would then be able to emulate this work at a local level to support more specific CD Standard Operating Procedures.

An NHS Management Trainee (on placement with pharmacy) subsequently delivered a training package to support CD management on wards together with quick reference guides to support correct use of the controlled drug register, administration of controlled drugs, the controlled drug cupboard (including keys) and patient's own controlled drugs. These are being piloted in collaboration with Morriston Hospital Service Group in the first instance. The CDAO will receive a report on this pilot at the Controlled Drug Accountable Officer Governance Group. It is anticipated that refinements may be required to the educational material prior to Health Board wide roll out.

In keeping with the ethos of the 3 phased model, each of the Service Group CD Management and Assurance Plans whilst focused around a set of common principles, have their own style of approach. It is hoped that this flexibility of approach will make the plans, which are intended to continuously evolve according to need, more meaningful to individual Service Groups and more useable as an instrument of change.

However, to support Service Groups to ensure relevant statutory requirements are considered when reviewing their plans, the CDAO has sought to strengthen the Health Board CD policy, particularly around the requirements of, 'The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008.' These amendments were ratified at the May 2022 Health Board PGD & Medicines Policy Group.

In December 2021, NWSSP Audit and Assurance published an internal audit briefing paper on controlled drugs governance in the Health Board. This was presented and discussed at the January 2022 meeting of the Health Board's Audit Committee following which it was referred to Quality and Safety Committee for discussion at their February 2022 meeting. The overall objective of the audit (undertaken Q3, 2021/22) was to review the Health Board's progress in strengthening CD governance by assessing Service Group implementation of the phased measures noted above.

One of the key limitations of the audit was that it was unable to determine whether the Service Group's CD Management and Assurance plans were collectively addressing all areas of CD control weakness, due to their design being by exception. The auditors also state that due to the scope of their review focusing on seeking to provide an update on progress of the strengthening phases, which is still maturing, they were unable to make an assessment on the Health Board's broader management of CDs and level of compliance with legislation.

As a result, Audit and Assurance colleagues are currently undertaking a further audit reviewing the Health Board's compliance with the Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008. A de-brief meeting for the Executive Medical Director and the CDAO regarding this audit has been arranged for the 20<sup>th</sup> October 2022.

The CDAO will continue to work with Service Group CD Leads over the coming months to facilitate strengthening of CD governance. Specific sessions to provide a particular focus on exploring the opportunity to develop an assurance framework to complement the Health Board CD policy have been postponed until Audit and Assurance colleagues report on the above audit. It is anticipated that the outcomes of this audit will help inform such an assurance framework.

### **3. GOVERNANCE AND RISK ISSUES**

The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008 place a statutory responsibility on the Health Board and its CDAO to ensure the safe management and use of CDs. Strengthening of CD governance is required across the Health Board in order to move towards a fully compliant position against these statutory responsibilities. The actions taken to date and future plans outlined in this paper will mitigate this risk of non-compliance through strengthening the Health Board's CD governance and allowing an efficient and comprehensive approach to application of remedial action.

#### **4. FINANCIAL IMPLICATIONS**

This proposal will require a significant amount of time from both staff supporting the CDAO, Service Groups and corporate colleagues. In recognition of this, the phased approach to implementing strengthened CD governance is designed to deliver improved governance within a context of existing service pressures and competing priorities.

#### **5. RECOMMENDATION**

Members are asked to receive this progress report detailing the actions taken to strengthen controlled drug governance across the Health Board.

<b>Governance and Assurance</b>		
<b>Link to Enabling Objectives</b> <i>(please choose)</i>	<b>Supporting better health and wellbeing by actively promoting and empowering people to live well in resilient communities</b>	
	Partnerships for Improving Health and Wellbeing	<input type="checkbox"/>
	Co-Production and Health Literacy	<input type="checkbox"/>
	Digitally Enabled Health and Wellbeing	<input type="checkbox"/>
	<b>Deliver better care through excellent health and care services achieving the outcomes that matter most to people</b>	
	Best Value Outcomes and High Quality Care	<input checked="" type="checkbox"/>
	Partnerships for Care	<input checked="" type="checkbox"/>
	Excellent Staff	<input type="checkbox"/>
	Digitally Enabled Care	<input type="checkbox"/>
	Outstanding Research, Innovation, Education and Learning	<input type="checkbox"/>
<b>Health and Care Standards</b>		
<i>(please choose)</i>	Staying Healthy	<input type="checkbox"/>
	Safe Care	<input checked="" type="checkbox"/>
	Effective Care	<input type="checkbox"/>
	Dignified Care	<input type="checkbox"/>
	Timely Care	<input type="checkbox"/>
	Individual Care	<input type="checkbox"/>
	Staff and Resources	<input checked="" type="checkbox"/>
<b>Quality, Safety and Patient Experience</b>		
Action taken to strengthen CD governance across the Health Board will include improvements in the quality and safety of care provided, as it relates to CDs and hence the patient experience.		
<b>Financial Implications</b>		
The implementation will require a significant amount of time from both staff supporting the CDAO, Service Groups and corporate colleagues. In recognition of this, the phased approach being taken is designed to deliver improved CD governance within a context of existing service pressures and competing priorities.		
<b>Legal Implications (including equality and diversity assessment)</b>		
The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008 place a statutory responsibility on the Health Board and its CDAO to ensure the safe management and use of CDs. Strengthening of CD governance is required across the Health Board in order to move towards a fully compliant position against these statutory responsibilities.		
<b>Staffing Implications</b>		
The strengthening of CD governance will require a significant amount of time from both staff supporting the CDAO, Service Groups and corporate colleagues. In recognition of this, the phased approach being taken is designed to deliver improved CD governance within a context of existing service pressures and competing priorities.		
<b>Long Term Implications (including the impact of the Well-being of Future Generations (Wales) Act 2015)</b>		

<ul style="list-style-type: none"> <li>○ <b>Long Term</b> – The Health Board will have strengthened CD governance in line with requirements of, ‘The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008.’</li> <li>○ <b>Prevention</b> – Strengthened CD governance will help to prevent CD incidents.</li> <li>○ <b>Integration</b> – Integrating the requirements of, ‘The Controlled Drugs (Supervision of Management and Use) (Wales) Regulations 2008,’ with the existing governance mechanisms of the Health Board will strengthen overall CD governance.</li> <li>○ <b>Collaboration</b> – The approach being taken will encourage collaboration between Service Groups in the development of strengthened CD governance.</li> <li>○ <b>Involvement</b> – Health Board wide involvement in the development of strengthened CD governance will produce a synergistic effect at a whole system level.</li> </ul>	
<b>Report History</b>	<ul style="list-style-type: none"> <li>• Presentation made to the SLT in March 2019 regarding concerns about controlled drug governance.</li> <li>• Paper presented to SLT on the 6<sup>th</sup> November 2019 entitled ‘Controlled Drug Governance: Update Report’ – this paper outlined the previous concept of a Health Board CD Governance Framework.</li> <li>• Paper presented to SLT on the 5<sup>th</sup> November 2020 entitled, ‘Controlled Drug Governance and Assurance’ – This paper set out the new phased approach to strengthening CD governance.</li> <li>• Paper presented to Quality &amp; Safety Committee on 27<sup>th</sup> April 2021 entitled ‘Controlled Drug Governance and Assurance (Progress Report)</li> <li>• Paper presented to Quality &amp; Safety Committee on 23<sup>rd</sup> November 2021 entitled ‘Controlled Drug Governance and Assurance (Progress Report)</li> <li>• Paper presented to Quality &amp; Safety Committee on 24<sup>th</sup> May 2022 entitled ‘Controlled Drug Governance and Assurance (Progress Report)</li> </ul>
<b>Appendices</b>	N/A