

Guidance Note: Veterinary Practices



This Guidance Note has been developed with regards to the elevated risks posed to veterinary practices as a result of the ongoing COVID-19 situation.

The Guidance Note is intended to compliment the statutory regulations governing veterinary practices and the use of controlled drugs, as imposed by the Home Office, the Veterinary Medicines Directorate (VMD), and the Royal College of Veterinary Surgeons (RCVS).

Social Distancing:

Encourage staff to positively engage with customers, promote social distancing and vigilance.

Consider a 'meet and greet' approach at the main door; only essential business should be conducted within the reception area as this will reduce the risk to staff and customers.

Ensure that social distancing measures are in place, and that these are reinforced by clear rule setting in the form of signage and floor markings. Temporary cordons may also be appropriate where customers are likely to queue in any number.

Controlled Drugs (CD) Cabinets:

The police endorse the general recommendations of the VMD and the RCVS in this respect, and Practices should ensure that their CD cabinet meets the following criteria:

- The cabinet must adhere to 'The Misuse of Drugs (Safe Custody) Regulations 1973' in terms of its design and construction.
- The relevant British Standard for medicine cabinets is BS 2881: 1989; this has 3 levels of security. An assessment of the risk should be made and a cabinet commensurate with that risk should be purchased.
- Ideally, the cabinet should be located in a locked room, which is physically and visually inaccessible to clients and other visitors to the practice.
- The cabinet should be securely bolted to a solid wall or floor.
- The lock must be different to any other lock in the practice; it should be double locked with separate keys.
- Keys should only be made available to authorised members of staff.
- The cabinet should not in any way signify that CDs are stored inside it.
- The cabinet should be kept locked when not in use.

- Review your Standard Operating Procedures (SOPs); these should provide clarity and consistency for all staff handling CDs.
- Review the remote supply of drugs, consider any potential for interception, and mitigate the risks.
- Ensure that clinical waste is disposed of in the appropriate manner.

Intelligence and Mitigation:

1. Disruption to the Drugs Industry.

You will be aware that Schedules 1-5 of 'The Misuse of Drugs Act 2001' (The Act) list all controlled drugs in decreasing order of severity of control.

Under normal circumstances, all Schedule 2 drugs (with the exception of Quintalbarbitone), and all Schedule 3 drugs containing Buprenorphine, Diethylpropion, Flunitrazepam, and Temazepam, must be stored in the CD cabinet.

However, the current situation with COVID-19 has interrupted the drugs industry and this has had a knock on effect on the availability, and price of on-street drugs. In addition, community pharmacies have suspended the practice of supervised dispensing which means that clients now take larger quantities of drugs such as Methadone away from the pharmacy to self-medicate. This may result in clients quickly looking for substitute medication, leaving their programme of controlled substitute, and having a negative impact on the community.

Intelligence suggests that the main target for those with a chaotic drug habit will be opiate based products such as Codeine and Tramadol, and benzodiazepines such as Diazepam. These appear in the lower Schedules of The Act, with the lower strengths not needing to be stored in CD cabinets.

We strongly recommend that this type of medication be stored in a CD cabinet where capacity allows, or as a minimum be locked away, and out of view until such time as the situation resolves itself.

2. Bogus Telephone Calls

There have been a number of recent incidents whereby bogus telephone calls have been made to community pharmacies. The caller purports to be a police constable offering security advice. The caller enquires as to the nature and quantity of drugs stored on the premises, delivery schedules and security measures in place.

The police would not generally make this type of enquiry by telephone. We recommend that staff members ask for the caller's name, collar number, police station, and contact number, and that they report the incident to their practice manager and the police.

Never give this type of information over the telephone.

General Security:

- Ensure that your key holder details are up to date.
- Ensure that your physical security measures are in place and operating correctly e.g. CCTV, Practice and Personal Attack Alarms (PAAs).
- If you have PAAs make sure that staff members know how to use them - and what response to expect. *Staff should only activate a PAA where it is safe to do so.*
- Erect overt signage outlining the security measures in place at your practice; this will help to deter potential criminals.
- Do not advertise security measures that you *do not have* in an attempt to deter criminals; this may have an adverse effect.
- Leave till drawers empty and open where possible.
- Ensure that the dispensary area is well secured.
- Leave the main lights on after closing time and ensure that the reception/dispensing counter remains well lit.
- Contact your security provider(s) to inform them of any changes to your usual routine e.g. reduced opening hours, cessation of trading or empty premises.
- If you occupy a shared building, speak to your partners. Discuss your security procedures, opening and closing times, and any change in routines.
- Always employ at least 2 staff members to open and close the practice. One of the staff members should stand away from the building line to observe the process and report any problems.
- Develop procedures to deal with social distancing or client frustrations. De-escalation techniques should be used wherever possible. Staff should not feel the need to 'have the last word' – if a client is being verbally abusive as they leave the practice, do not respond. *They are moving in the right direction* – let them leave and when it is safe, lock the door behind them and report the incident to the police.
- Develop procedures to deal with a robbery; these should be developed with staff safety in mind.
- Consider erecting a temporary barrier across open plan counters to restrict access.
- Ensure that staff members have a place of safety into which they can retreat at times of duress.
- Ensure that all staff members receive, understand and implement training around the physical security measures and procedures which are in place to protect them.
- Advise staff to cover their uniforms / remove lanyards when arriving at or leaving the Practice.
- Be aware of suspicious activity in the immediate vicinity of your Practice. Report anything of concern to the police.
- In an emergency, where there is an immediate threat of harm to people or property, always dial 999.
- To report a non-urgent crime or incident please visit *Single On Line Home* at www.gmp.police.uk If you do not have internet access you can dial 101.

Longer Term Security Considerations:

Whether your practice is a purpose built facility, or whether it is located within a larger building, it is important to consider your immediate environment, the approach to your building line, and the security of the building as a whole.

The following link will take you to the Secured by Design website where you will find advice and guidance on all these aspects of the security process:

https://www.securedbydesign.com/images/downloads/SBD_Commercial_2015_V2.pdf

In addition, please note the following relevant advice:

- The dispensary is a vulnerable part of the building, which can attract all forms of drug dependent people. It should have a separate alarm zone within the main alarm system.
- The dispensary should not form any part of the external structure, but be located within easy reach of the main entrance. The dispensary walls should be masonry in construction and be built up to the underside of the floor above.
- If the dispensary does form part of the shell, expanded metal should be fitted interstitially and against the brickwork.
- The staff entrance should be located away from the client entrance, and should have a controlled access facility (i.e. coded key pad) which renders it inaccessible to the public.
- All key pads within the practice should have their numbers changed on a regular basis.
- The reception/dispensary counter should be high and wide to prevent staff from coming into direct contact with customers. The floor behind the counter may be raised. Any screen should use minimum 7.5mm laminated glass. A personal attack alarm should be fitted behind the counter.
- The pharmacy counter should benefit from both natural surveillance and CCTV coverage. In addition no toilets should be located in or near dispensary areas.

Further Advice and Guidance:

For further advice on the subjects covered in this Guidance Note please visit the following websites:

The Royal College of Veterinary Surgeons (RCVS) at www.rcvs.org here you will find the publication: '*Controlled Drugs Guidance Common Topics: Consolidation of Legislation and Advice*' (RCVS). A guide to statutory legislation is included at Annex A.

The British Small Animal Veterinary Association (BSAVA) at www.bsava.com here you will find the publication: '*BSAVA Guide to the Use of Veterinary Medicines*' (BSAVA).

The Home Office at www.legislation.gov.uk here you will find:

- The Misuse of Drugs (Safe Custody) Regulations 1973
- The Misuse of Drugs Regulations 2001

The Greater Manchester Police at www.gmp.police.uk here you will find our latest COVID-19 related crime prevention advice. The following documents may be of interest:

- Security of Empty Premises
- Security of Delivery Drivers
- Dealing with Workplace Violence

The Association of Police Controlled Drugs Liaison Officers at www.apcdlo.org here you will find advice on all aspects of CD use and storage, plus the latest crime trends.

Secured by Design at www.securedbydesign.com here you will find police recommended Design Guides and Security Standards.

The Health and Safety Executive at www.hse.gov.uk here you will find legislation and more detailed advice on violence and aggression in the workplace.

How to Contact the Police:

- In an emergency, and where there is the immediate threat of harm to people or property always ring 999.
- To report non-urgent incidents or crimes please use 'Single Online Home' at www.gmp.police.uk
- If you do not have access to the internet, please report non-urgent incidents or crimes by ringing 101.
- If you would like to report any crimes, incidents or information in a confidential manner, please contact Crimestoppers on 0800 555 111 or visit their website at <https://crimestoppers-uk.org>