



Guidance on When and How to Investigate a Schedule 2 Controlled Drug Discrepancy Community Pharmacy

If a Schedule 2 Controlled Drug (CD) discrepancy is discovered within a community pharmacy, it must be investigated immediately. There is a requirement to report all incidents and concerns involving CDs to the NHS Board Controlled Drugs Accountable Officer (CDAO). Receiving information on all CD incidents allows the CDAO to track trends and share these on an anonymous basis to raise awareness and minimise risk of recurrence.

Each community pharmacy must have their own standard operating procedure (SOP) in place detailing the action to be taken in the event of a Schedule 2 CD discrepancy.

This guidance document is a quick reference guide detailing suggested checks to be completed. Appendix A (Record of Schedule 2 Controlled Drug Discrepancy Investigation) is a template that can be used to document and record actions taken. These can be adopted into local SOP's.

Liquid CDs only – all underages of liquid CDs must be investigated. Local SOPs will detail the accepted tolerance for overages; however all overages within the accepted tolerance must be reviewed i.e. is the overage in line with previous discrepancies. If the overage is within the tolerance, but greatly differs from the volume of previous discrepancies, of the same product, an investigation should be undertaken.

Step 1 – discrepancy identified

- Identify the date of the last accurate balance check.
- **Liquid CDs only** - consider the discrepancy tolerance i.e. is it in line with previous discrepancies.
- Complete a second check of the physical quantity with another member of staff.
- Enter the confirmed balance in the CD register and make a note clearly stating that the discrepancy is under investigation.
- Escalate the discrepancy as per local SOP.

Step 2 - checks

The date range for CD register checks is from the date of the last accurate balance check.

- Check all medicine storage areas, including expired stock area. (Check the corners, behind the hinges, in the shelves if applicable)
- Check all dispensed items, including instalments, not collected have been counted in the physical balance check.
- Check the accuracy of arithmetic of entries/running balance.
- Check all amendments in the CD register, including any entries that have been marked as 'void' (electronic CD registers only).
- Check balance transfers are transferred correctly e.g. page to page, from previous CD register (paper CD registers only).
- Check the CD register for other preparations of the same drug for any incorrect entries.
- Check the quantities of Schedule 2 CDs awaiting collection i.e. does the quantity on the label match the quantity dispensed.
- Complete a stock balance of all other preparations of the same drug.
- Check all supplies, as per patient medication records. have been recorded in the CD register.
- Check all CD private prescriptions, requisitions and GP10A's have been recorded in the CD register.
- Check all receipts/invoices have been recorded in the CD register.
- For liquid preparations, check if a spillage has occurred that has not been recorded in the CD register.
- Check if there has been any return of CDs to the supplier e.g. drug recall and ensure these are recorded in the CD register.
- Check if there have been any dispensing errors involving the Schedule 2 CD which has a discrepancy.

- Complete a stock balance of all other Schedule 2 CDs.
- Consider contacting patients who have received stock since last balance check to ensure they received the correct quantity.

If the discrepancy is resolved as part of these checks, the CD register must be updated with the correct balance as per the local SOP. Shared learning within teams is encouraged to allow for processes to be reviewed, raise awareness, and minimise the risk of recurrence.

Step 3 – next steps if the discrepancy is unresolved

- Update CD register with the outcome of investigation, including reference to reporting to CDAO, as per your local SOP.
- Identify preventative actions.
- Review current frequency of balance checks i.e. increase frequency of balance checks.
- Follow reporting process as per local SOP e.g. report to Area Manager etc.
- Complete CD incident form – available at [NHS Community Pharmacy Website \(scot.nhs.uk\)](https://www.scot.nhs.uk/nhs.uk/community-pharmacy/nhs-community-pharmacy-website)
- Submit incident form to NHS Lothian Controlled Drug Accountable Officer
loth.controlleddruggovernance@nhs.scot
- Incident shared with staff and processes reviewed

Schedule 2 Controlled Drug Discrepancy Record of Investigation

1. Details of Discrepancy					
Name of pharmacy:					
Date and time discrepancy identified:		Discrepancy identified by:			
Drug: (Name, form, strength)					
Quantity in CD Register:		Physical quantity:		Discrepancy quantity:	
Date of last accurate balance check:		Second check of balance completed by:			
2. Record of Checks					
Check	Completed by:	Information/Comments:			
Check all medicines storage areas, including expired stock area. (Check the corners, behind the hinges, in the shelves if applicable)					
Check all dispensed items, including instalments, not collected have been counted in the physical balance check.					
Check the accuracy of arithmetic of entries/running balance.					
Check all amendments in the CD register, including any entries that have been marked as 'void' (electronic CD registers only).					
Check balance transfers are transferred correctly i.e. page to page, from previous CD register (paper CD registers only).					
Check the CD register for other preparations of the same drug for any incorrect entries.					
Check the quantities of Schedule 2 CDs awaiting collection i.e. does the quantity on the label match the quantity dispensed.					
Complete a stock balance of all other preparations of the same drug.					
Check all supplies, as per patient medication records, have been recorded in the CD register.					
Check all CD private prescriptions, requisitions and GP10A's have been recorded in the CD register.					
Check all receipts/invoices have been recorded in the CD register.					
For liquid preparations, check if a spillage has occurred that has not been recorded in the CD register.					
Check if there has been any return of CDs the to the supplier e.g. drug recall and ensure these are recorded in the CD register.					
Check if there have been any dispensing errors involving the Schedule 2 CD which has a discrepancy.					
Complete a stock balance of all other Schedule 2 CDs.					
Consider contacting patients who have received stock since last balance check to ensure they received the correct quantity.					

3. Outcome of Preliminary Checks	
Error identified and stock discrepancy resolved: Y/N	If yes, go to 4 If no, go to 5
4. Discrepancy Resolved	
Action	Completed by:
Update CD Record Book (Register) i.e. Record nature of error and reconcile balance (witnessed by a 2nd registered healthcare professional).	
Escalate outcome, as per SOP.	
Incident shared with staff and processes reviewed.	
5. Discrepancy NOT Resolved	
Action	Completed by:
Update CD register with the outcome of investigation, including reference to reporting to CDAO	
Escalate outcome, as per SOP	
Identify preventative actions	
Review current frequency of balance checks i.e. increase frequency of balance checks	
Complete CD incident form – available at NHS Community Pharmacy Website (scot.nhs.uk) Submit incident form to NHS Lothian Controlled Drug Accountable Officer loth.controlleddruggovernance@nhs.scot	
Incident shared with staff and processes reviewed.	
6. Record of Completion	
Completed by:	Date and time completed: