Prescribing, supplying, dispensing and labelling procedures

Prescribing procedures

KEY POINTS
- A prescription can be oral (if the prescriber also supplies or administers the medicine), or it can be in writing
- Written prescriptions are valid for 6 months unless the prescriber specifies a shorter period

"Prescribing" refers to the action of assessing the animal’s disease or condition and deciding on the most appropriate medicine to supply or administer. A prescription, which can be either oral or written, is the means by which the action of prescribing is relayed to the customer.

Products classified as ‘prescription-only medicine – veterinarian’ (POM-V) and ‘prescription-only medicine – veterinarian, pharmacist, suitably qualified person’ (POM-VPS) may be prescribed orally if the prescriber also supplies or administers the product.

Where a veterinary medicine is not supplied by the person who prescribed it, the prescription must be written.

The classification of a veterinary medicine determines who can prescribe it (see also Authorization and classification).

POM-V

Only a veterinary surgeon may prescribe a POM-V medicine (or a product for administration under the cascade). A POM-V medicine may only be prescribed following a clinical assessment of the animal, and the animal must be under that veterinary surgeon’s care.

The Veterinary Medicines Regulations (VMR) do not define what a clinical assessment is nor ‘under the vet’s care’ but the RCVS’s Code of Professional Conduct for Veterinary Surgeons provides guidance (see sections 4.9–4.12).

POM-VPS

A vet, pharmacist or suitably qualified person (SQP) may prescribe a POM-VPS medicine. The animal does not have to be under their care and they do not have to carry out a clinical assessment of the animal. However, when prescribing a POM-VPS medicine, the prescriber must consider all available information about the animal(s), its condition and the required treatment, before deciding on the most appropriate veterinary medical product (VMP) to supply.

Products classified as ‘non-food animal medicine – veterinarian, pharmacist, SQP’ (NFA-VPS) or ‘authorized veterinary medicine – general sales list’ (AVM-GSL) do not have to be prescribed unless they are supplied for use outside of their marketing authorization (i.e. under the cascade).

Written prescriptions

Any person who is permitted to supply a POM-V or POM-VPS medicine may also supply such a product in accordance with a written prescription from another prescriber. They must satisfy themselves that the prescription has been written and signed by a pharmacist, who has also verified that the medicine is suitable for the indication and the animal.

The classification of a veterinary medicine determines who can prescribe it (see also Authorization and classification).

When a person supplies or administers a POM-V or POM-VPS medicine, the prescriber must consider all available information about the animal(s), its condition and the required treatment, before deciding on the most appropriate veterinary medical product (VMP) to supply.

Written prescriptions are valid for 6 months unless the prescriber specifies a shorter period.

A written prescription for a veterinary medicine must include the following information:
- Name, address and telephone number of the person prescribing the product
- Qualifications of the person prescribing the product (it is good practice to include their RCVS or SQP number)
- Name and address of the owner or keeper of the animal
- Identification (including the species) of the animal or group of animals to be treated
- Premises at which the animals are kept if this is different from the address of the owner or keeper
- Date
- Signature (or other authentication) of the person prescribing the product
- Name and amount of the product prescribed
- Dose and administration instructions
- Necessary warnings
- Withdrawal period, if relevant
- If it is prescribed under the cascade, a statement to that effect.

Written prescriptions for POM-V or POM-VPS medicines:
- Are valid for 6 months unless the prescriber states a shorter period
- May only be used once unless the prescriber specifies that it is repeatable
- If repeatable, the number of repeat supplies that may be made must be specified (if the prescription is not repeatable, it is considered good practice for it to state that).
Written prescriptions for Controlled Drugs

If a written prescription is issued for a Controlled Drug (CD) it can be typed, computer generated or handwritten, but it must be personally signed by the person issuing it. It is an offence to supply a Schedule 2 or 3 CD against a faxed or emailed prescription.

In addition to the general prescription requirements above, a written prescription for a Schedule 2 or 3 CD should state an exact dose in words as well as in figures (e.g. not “as directed”), and it must include the RCVS number of the vet prescribing the drug.

A written prescription for Schedule 2 or 3 CDs can only be dispensed once and only within 28 days. Single prescriptions with multiple dispenses (repeatable prescriptions) are not allowed for Schedule 2 and 3 CDs. It is good practice to mark the prescription “no repeats”.

It is a best practice recommendation to dispense only 28 days of CDs at a time. If it is considered necessary to dispense a CD for a longer period (e.g. in the case of an epileptic dog on long-term medication), the veterinary surgeon must make sure that the owner is competent to use and store it safely.

See also Controlled Drugs.

Supplying procedures

KEY POINTS

■ When medicines are supplied the owner must be advised how to use the medicine and on any warnings or contraindications
■ If a veterinary surgeon delegates the handing over of a medicine to a team member, they must be satisfied that the person handing it over is competent to do so
■ A veterinary surgeon must authorize each transaction for POM-V, POM-VPS and NFA-VPS medicines

A veterinary surgeon may only supply POM-V, POM-VPS and NFA-VPS medicines from premises registered with the RCVS as veterinary practice premises (VPP).

A pharmacist may also supply POM-V, POM-VPS and NFA-VPS products from a registered VPP, as well as from premises registered as a pharmacy with the General Pharmaceutical Council (GPhC) in Great Britain or the Pharmaceutical Society of Northern Ireland (PSNI) in Northern Ireland. They may also supply POM-VPS and NFA-VPS products from an approved SQP retailer premises.

An SQP may supply POM-VPS and NFA-VPS medicines from premises approved as SQP retailer premises. SQPs may also supply those products from a registered VPP, as well as from premises registered as a pharmacy with the GPhC in Great Britain or the PSNI in Northern Ireland.

It is a best practice recommendation to dispense only 28 days of CDs at a time. If it is considered necessary to dispense a CD for a longer period (e.g. in the case of an epileptic dog on long-term medication), the veterinary surgeon must make sure that the owner is competent to use and store it safely.

See also Controlled Drugs.

A veterinary surgeon must authorize each transaction individually before the product is supplied. The transaction may be authorized by the vet at the time of supply (e.g. during a consultation). For supply in the absence of the vet (e.g. clients requesting repeat prescriptions of long-term medicines), the veterinary surgeon could meet the requirement to authorize each transaction:

■ By the vet making a note on a client’s record that repeat prescriptions can be supplied to that client within a certain time limit
■ By a member of staff taking a call from a client and putting a medicine aside for the veterinary surgeon to authorize before it is supplied
■ Or, in the case of a client unexpectedly coming into the practice, by means of a phone call to the veterinary surgeon to authorize the supply.

If the veterinary surgeon does not personally hand the product over, they must be satisfied that the person who is handing it over is competent to do so. This would entail having a written procedure (a standard operating procedure (SOP)) in place and staff training to achieve and maintain an appropriate level of competence.

Pharmacists must also authorize each transaction individually before the product is supplied and, if not personally handing the product over, must be satisfied that the person who is handing it over is competent to do so.

See also Prescribing cascade.

See also Correct storage, dispensary management and standard operating procedures.
Wholesale dealing

Wholesale dealing means the procurement, holding, storage or distribution of a VMP to a person who intends to further wholesale it or supply it by retail. It does not include the retail supply of a VMP to the end user (owner of the animal).

A wholesale dealer’s authorization (WDA) is required to wholesale any veterinary medicine, including those categorized AVM-GSL, Schedule 6 products, homeopathic remedies and products imported under a Special Import Certificate or Special Treatment Certificate. A human wholesale licence is required to wholesale UK authorized human medicines, even if they are supplied for veterinary use.

Emergency supply

An authorized retailer of veterinary medicines may supply products which fall within the scope of the qualification they hold to another authorized retailer, in order to relieve a temporary supply shortage that could be detrimental to animal welfare.

Labelling procedures

**KEY POINTS**

- There is no legal requirement to label veterinary medicinal products (VMPs) supplied in their authorized packaging
- The Royal College of Veterinary Surgeons (RCVS) requires labelling on all dispensed products
- All cascade products must be labelled

While there is no legal requirement to label authorized veterinary medicines that are dispensed in their original packaging for an authorized use, both the Veterinary Medicines Directorate (VMD) and the RCVS consider it good practice for all POM-V medicines to have a dispensing label attached; however, care should be taken so that labels do not obscure any information (e.g. batch numbers or expiry dates) on the packaging. It is an offence to cover this information.

For a VMP **supplied in its authorized packaging** for a condition and species listed on its summary of product characteristics (SPC) there is no legal requirement to label, but the RCVS Code of Professional Conduct states that VMPs must be supplied in appropriate containers and with appropriate labelling.

Whilst there are no specific labelling requirements in the VMR or in the RCVS’s Code of Professional Conduct, the Practice Standards Scheme (PSS) requirements for labelling POM-Vs (see below) may prove helpful.

For a VMP **supplied in a container other than that specified in the marketing authorization** (e.g. tablets dispensed into smaller containers) the person supplying the product must ensure that the container is “suitably labelled” and must supply sufficient written information for the medicine to be used safely.

This legal requirement may be met by:

- Labelling the product in accordance with the PSS’s requirements (see below)
- And providing a copy of the package insert or the SPC to the client.

Only when using a medicine prescribed under the cascade is it legally necessary to attach a dispensing label.

**RCVS PSS requirements for labelling VMPs**

**Medicines other than POM-Vs**

- In accordance with their MA and the VMR.
- Name and address of the practice supplying the product.

**POM-V Medicines**

All POM-V medicines supplied by the practice must be legibly and indelibly labelled with:

- Name and address of the animal owner
- Name and address of the veterinary practice supplying the medicine
- Date of supply
- Name, strength and quantity of product
- Dosage and directions for use
- ‘For animal treatment only’
- For topical preparations ‘For external use only’.

VMPs supplied under the cascade

A person who supplies a product under the cascade must label the product with:

- Name and address of the pharmacy or veterinary practice supplying the product
- Name (or initials) of the veterinary surgeon who prescribed it
- Name and address of the animal owner
■ Identification (including the species) of the animal or group of animals
■ Date of supply
■ Expiry date of the product, if applicable
■ Name or description of the product (at least the name and quantity of active ingredients)
■ Dosage and administration instructions
■ Any special storage precautions
■ Any necessary warnings for the user, target species, administration or disposal of the product
■ Withdrawal period, if relevant
■ ‘Keep out of reach of children’ and ‘For animal treatment only’.

These are a legal requirement of the Veterinary Medicines Regulations.

QUESTIONS

1. Which of the following facts about prescribing is correct?
   a. It is the same as selling
   b. Only vets are allowed to prescribe
   c. It is assessing requirements and choosing the most appropriate medicine
   d. It always consists of writing a written prescription

2. When a POM-V medicine is prescribed the vet must:
   a. Be sure that the person who will use the product is competent to do so safely
   b. Advise the customer on how to administer the medicine safely and on any warnings or contraindications
   c. Make sure, if another staff member hands it over, they are competent to do so
   d. All of the above

3. A written prescription for a POM-V medicine does not need to include:
   a. The identification of the animal or group of animals to be treated
   b. The expiry date of the product
   c. The premises at which the animals are kept if this is different from the address of the owner or keeper
   d. The dose and administration instructions and any necessary warnings

4. Medicines prescribed under the cascade:
   a. Must always be labelled
   b. Never need to be labelled
   c. Must be labelled if they are not in their original packaging
   d. No legal requirement to label but RCVS recommends it as best practice

ANSWERS

1 – c; 2 – d; 3 – b; 4 – a