Minister for Drugs and Alcohol Policy submission of 28 March 2024

PE1900/U: Access to prescribed medication for detainees in police custody

As the newly appointed Minister for Drugs and Alcohol Policy, I would like to thank you for your letter dated 11 March 2024, requesting an update on the work of relevant Health Boards in obtaining Controlled Drug Licenses and implementing written policies on access to prescribed medication.

I have been briefed thoroughly on my predecessor's commitment to the Citizen Participation and Public Petitions Committee and Criminal Justice Committee, relevant to petition PE1900: Access to prescribed medication for detainees in police custody.

Therefore, as part of our ongoing work to support a positive outcome from this petition, my officials have been engaging with the relevant areas following the rapid review which was carried out in spring 2023. I can confirm that officials have been following up on the information each health board provided to ensure timescales are met, and that processes are put in place and support the delivery of these actions. This work is still ongoing.

I note that the outstanding issues with named health boards were raised during the Committee meeting, and therefore I have provided a brief summary of their position below:

- **NHS Grampian:** As arranged, the premises inspection took place on 4 October 2023. Following that inspection, there were some actions that required follow-up, which have since been actioned. NHS Grampian have had no further communication with regards to their application for a controlled drug licence, but understand that a delay is not unusual.
- NHS Lanarkshire: The Disclosure and Barring Service (DBS) process for their service lead was delayed, but they have had assurance that this will be processed and completed soon. They have advised that once this element is completed, the application can proceed, with an anticipated timeline of approximately 12 weeks for the final element of the licensing process.

- **NHS Western Isles:** Home Office colleagues confirmed that, in this case, a controlled drug licence is not required.
- **NHS Dumfries and Galloway:** A controlled drug licence has now been obtained.
- NHS Shetland: NHS Shetland do not use controlled drugs for the delivery of custody healthcare in a way that would require a controlled drug licence. They have also advised that the designated lead for urgent and unscheduled care continues to review and develop process and procedure, and that there is now better integration of urgent and unscheduled care work involving custody health care. (further information on this is available at the end of this letter).
- NHS Orkney: Status currently TBC.

Please also see attached table which outlines, in detail, the current position of all health boards.

I can confirm that my officials will continue to engage with the relevant areas until all requirements have been met and procedures have been put in place.

In terms of monitoring the progress of this work going forward, we propose requesting annual updates from health boards, ensuring that they have continued to comply with the requirements set out in the Rapid Review. My officials are considering if this can be included as part of existing statistical datasets and, if not, it will be issued as a standalone request.

I thank you for your steer on this matter, and look forward to working with you.

Kind regards,

CHRISTINA MCKELVIE MSP

Assessment of support in police custody, in line with the findings of the HMICS Review of policy custody units in Lanarkshire

Green: No further action required Orange: Follow up required

Health- boards	1) Do you have a controlled drug license in place to store and/or supply controlled drugs in every police custody unit in your health board area?	2) Do you have written policies and effective practices in place which ensure that every detainee has access to their prescribed medication in custody, whether that be OST or any other prescribed medication?	3) Do you have robust processes and adequate training to ensure that every adverse health event, complaint or feedback is recorded on Datix, and are these reviewed regularly?	If no to any of these questions, then what is your plan for implementing this and what is the timescale for completion:	Officials followed up with health boards who said no to any of these questions during the rapid review, on 5 September 2023. <u>Health board</u> <u>responses were as</u> <u>follows:</u>	Officials followed up with the relevant health boards again for an update on their progress. These follows up took place between January and March 2024. <u>Health board</u> <u>responses were</u> <u>as follows:</u>
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NHS Ayrshire and Arran	Yes • A current controlled drug licence is in place within each of the three Police custody units in Ayrshire and Arran. The current licences are valid until 26 September 2023. • The first application for controlled drug licences for the Police custody suites was submitted by NHS Ayrshire and Arran to the DFLU in 2017.	Yes • A policy is in place relating to the provision of medication within the custody suites 'Medicines Management within Police Custody Suites Local Operating Procedure'. • Within the Medicines Management LOP a further policy is referred to which details the 'Process for Detainees Receiving Methadone or Opiate Substitution Therapy'. This SOP describes the process of obtaining medication from community pharmacy or using interim prescriptions to continue treatment in custody for the	Yes • Services with the Police custody suites are exclusively provided by an independent contracted provider (current COMS) with specification made for complaints or feedback described within the document 'Mainland Healthcare and Forensic Medical Services for People in Police Custody Service Specification and Clinical Model' • Complaints regarding Justice Settings are reviewed by the NHS Clinical Service Manager Justice Healthcare Services and discussed by the Prison and Police Custody Clinical Governance Group.	N/A	N/A	N/A
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necessary duration. • These were recently noted to be in need of update with regards a few details (contact numbers, team names, staff in post etc) and are currently being reviewed by the management team for renewal.			
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NHS Borders	Yes NHS Lothian host Police Custody Healthcare services for NHS Lothian, NHS Fife, NHS Forth Valley and NHS Borders. The governance of each area is checked on a rotational basis when the licence needs to be renewed. Governance is underpinned by CD Governance Teams in the Health Board areas, daily/ 72- hour CD checks and a monthly report which feeds into the Health and Safety quarterly report to NHS Lothian Board. Pharmacy ordering and supply for CD	Yes Effective practice. Every detainee who is on prescribed medication is referred to the service using single point referral service. There is no discrimination between essential medications. Missed dose protocols are followed for all medications if relevant. OST collection can be from patient's home or pharmacy if it is supported by corroboration from Emergency Care Summary/ Pharmacist/Patient/ GP.	Yes All staff complete Learn Pro training regarding Datix and significant adverse event reporting. Senior Charge Nurses attend a two- day training for management of adverse events. Datix and understanding of policy is recorded on quarterly Health and Safety Reports which go to NHS Lothian Board via REAS SMT (directorate). Locally, a spreadsheet is updated on a monthly basis and SCNs carry out monthly checks and reports as part of staff management supervision arrangements.	N/A	N/A	N/A
	ordering and supply for CD schedule 3 drugs		Police Scotland and NHS Lothian teams			

is supported by standard operating procedures which are displayed on an intranet page for the service.	can raise a Service Review Form in which operational matters can be discussed and any actions taken based on SBAR format.		

NHS Dumfries and Galloway	No (Refer to column E)	Yes Work was undertaken at the request of Police Scotland in 2022 to look at arrangements for administration of medicines in D&G police custody suites; Nursing & FME have provided evidence of the processes that are in place for the prescribing & administration of medicines within police custody healthcare setting; It is worth noting that with any service it is subject to continual improvement and development; There is a local forum in existence at the clinical	Yes Patient Safety Team advises that our RM system (Datix) is configured to enable adverse events and complaints from custody suites to be logged on the system and reviewed/investigated as per NHS Dumfries & Galloway policies and procedures which fully comply with National Adverse Event & Learning Framework; We do though note from the Lanarkshire report that there is a risk of under reporting due to the need for effective communication across the different stakeholder groups (Police Scotland & NHS); As noted in Question2, there is a	1) At present we do not require a license from the Home Office for service. This is because controlled drugs (methadone for MAT) are prescribed on a named patient basis using GP10 prescription form & thus we hold no CD stocks that are not designated for; This is based on experience of applying for licenses for other healthcare services (SDAS and HMP Dumfries). CHSCP (the hosting directorate for police custody suite healthcare) will link with HO regarding licensing if operationally they wish to hold stocks of methadone in the future; Medicines storage	NHS D&G recently advised they do not require a drugs license. However, in the Custody Inspection Report published by HMICS in October 2023, the following recommendation was made: Recommendation 12: D&G HSPC must obtain a controlled drugs license to meet its legal obligation in the storing and supply of controlled drugs. Scottish Government officials sent NHS D&G a letter on 10 January 2024, to follow this up.	Apologies for the delay in getting back to I can advise that we have implemented the following action on receipt of : Recommendation 12: Dumfries and Galloway HSCP must obtain a controlled drugs license to meet its legal obligation in the storing and supply of controlled drugs.
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	operational level between Police Scotland & NHS colleagues where matters are raised & discussed.	monthly forum between Police Scotland & NHS for police custody healthcare - this forum would report and escalate any incidents that couldn't be resolved within it; This forum (which is linked operationally to the CHSCP GMs senior team via the service manager) would be appropriate for raising awareness of learning from the Lanarkshire report.	was reviewed in 2022 as part of our Controlled Drug Governance Improvement Plan (reporting via Annual CD Accountable Officer to Healthcare Governance Group) and improvements made to being in line with RPS Safe & Secure Handling of Medicines standards.		
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NHS Fife	Yes NHS Lothian host Police Custody Healthcare services for NHS Lothian, NHS Fife, NHS Forth Valley and NHS Borders. The governance of each area is checked on a rotational basis when the licence needs to be renewed. Governance is underpinned by CD Governance Teams in the Health Board areas, daily/ 72- hour CD checks and a monthly report which feeds into the Health and Safety quarterly report to NHS Lothian Board. Pharmacy ordering and supply for CD schedule 3 drugs	Yes Effective practice. Every detainee who is on prescribed medication is referred to the service using single point referral service. There is no discrimination between essential medications. Missed dose protocols are followed for all medications if relevant. OST collection can be from patient's home or pharmacy if it is supported by corroboration from Emergency Care Summary/ Pharmacist/Patient/ GP.	Yes All staff complete Learn Pro training regarding Datix and significant adverse event reporting. Senior Charge Nurses attend a two- day training for management of adverse events. Datix and understanding of policy is recorded on quarterly Health and Safety Reports which go to NHS Lothian Board via REAS SMT (directorate). Locally, a spreadsheet is updated on a monthly basis and SCNs carry out monthly checks and reports as part of staff management supervision arrangements. Police Scotland and NHS Lothian teams	N/A	N/A	N/A
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Valley N P H So L V B g G C C C C C C C C C C C C C C C C C C	Ves NHS Lothian host Police Custody Healthcare services for NHS Jothian, NHS Fife, NHS Forth /alley and NHS Borders. The governance of each area is checked on a otational basis when the licence needs to be enewed. Bovernance is underpinned by CD Governance reams in the Health Board areas, daily/ 72- nour CD checks and a monthly eport which eeds into the Health and Safety guarterly report to NHS Lothian Board. Pharmacy ordering and supply for CD schedule 3 drugs	Yes Effective practice. Every detainee who is on prescribed medication is referred to the service using single point referral service. There is no discrimination between essential medications. Missed dose protocols are followed for all medications if relevant. OST collection can be from patient's home or pharmacy if it is supported by corroboration from Emergency Care Summary/ Pharmacist/Patient/ GP.	Yes All staff complete Learn Pro training regarding Datix and significant adverse event reporting. Senior Charge Nurses attend a two- day training for management of adverse events. Datix and understanding of policy is recorded on quarterly Health and Safety Reports which go to NHS Lothian Board via REAS SMT (directorate). Locally, a spreadsheet is updated on a monthly basis and SCNs carry out monthly checks and reports as part of staff management supervision arrangements. Police Scotland and NHS Lothian teams	N/A	N/A	N/A
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NHS Grampian	No (Refer to collumn E)	Yes there is a current policy – 'Guidance on the Safe Management of Medicines including Controlled Drugs in NHS Grampian', however this is in the process of being updated to reflect the needs required to deliver the governance around the Controlled Drug Licence. The policy is near completion and is currently in its consultation period with key stakeholders. In addition we are currently reviewing and amending the NHS Grampian policy - 'Guidance on the Safe Administration of Medication including	Yes the Datix system is used widely within all 3 police custody suites in NHS Grampian. Once an adverse event report has been submitted, an appropriate level of review is carried out, and any necessary action/learning is implemented if required. All staff undertake DATIX training as mandatory and there are numerous trained Adverse Event Reviewers within the Partnership to support Level 1 and Level 2 Investigations. Currently across Aberdeenshire HSCP all Level 1 & 2 investigations are reported in to the Partnership Risk	1) At the moment there is no controlled drug licence in place for the 3 police custody suites within NHS Grampian. We are currently working towards submitting an application for a controlled drug licence, which will cover all 3 police custody suites within NHS Grampian. We are striving to submit the application by the end of May 2023, as we are finalising the policies and procedures that are required to be in place.	We submitted our controlled drug licence application to the Home Office on 23rd June 2023. We have since received notification, that the Home Office will carry out our premises inspection within Kittybrewster (Aberdeen) police custody, on Wednesday 4th October 2023. Scottish Government officials followed up with them on the progress of this on 1 February 2024.	Thank you for your email of 1st February, requesting a further update regarding the status of our controlled drug license application. The premises inspection took place as arranged on 4th October 2023. Following this meeting there were some actions that required follow-up. These were actioned within the timescale given of 19th October 2023. Since then, we have had no further communication and understand that a delay of this period is not unusual.
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	Controlled Drugs in Forensic and Custody Healthcare'. Again this is being updated to reflect the governance alongside the Controlled Drug Licence. Currently there is only a small percentage of our nursing workforce that hold the Non- medical Prescribing Qualification. However within our workforce planning we are working towards a model where it will be mandatory that all our nursing workforce will undertake Non- medical Prescribing as part of their role. As per above the	Group for sign off and approval and are escalated to the Clinical and Adult Social Work Group where necessary. Going forward we have plans to develop a Custody specific Quality and Risk Group to ensure local learning is gained from any identifiable themes, and provide assurances that all appropriate action is being taken and learning shared across all our Police Custody Suites.			
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	application for the Controlled Drug Licence is planned to be submitted at the end of May 2023.		

NHS Greater Glasgow and ClydeYes A controlled drug license is in place to store and supply Schedule 2 to 5 controlled drugs in every police custody healthcare suite in Greater Glasgow & Clyde.The most recent Home Office Compliance Visit was on 18th January 2023. The Home Office were satisfied with processes, policies and stock control / management across NHSGGC police custody healthcare and renewal of the Licence was granted.	Yes All individuals referred to the Police Custody Healthcare Team are assessed by a registered nurse and, where appropriate and it is safe to do so, local PCHC medicines policies will support the acquisition and administration of the individual's prescribed medication in custody. If OST is part of the patient's regular prescribed medication in discussion and agreement with Police Scotland, the individual's OST is collected from their identified pharmacy and administered as prescribed. In the event of this not being possible,	Yes All medication is managed and administered in line with Police Custody Healthcare Service CD Policy and Standard Operating Procedure as noted below. Training is included as noted through the induction process into Police Custody Healthcare with an agreed communication process for any updates, developments or amendments as noted by email, verbal and team meetings inclusive of minutes. All incidents or adverse events are recorded on Datix with review by the Senior Charge Nurse and investigation when required. When required events will	N/A	N/A	N/A
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	alternative medication will be prescribed and administered. This is not a regular occurrence and the aim is to maintain medication as prescribed where at all possible. Work is currently ongoing in relation to holding stock of OST (methadone, buprenorphine) within Police Custody Healthcare suites as part of our moves to implement MAT standards. The Standard Operating Procedure to support this is currently progressing through the relevant governance procedures within	be escalated to the Service Manager and/or Head of Service. This is monitored overall through Police Custody Healthcare Governance Group in the quarterly meetings. (PDF links available via email (1) The Safe and Sercure Handling or Contrilled Drugs Policy in NHSGGC Police Helath Care and (2) The Safe Management of Controlled Drugs in NHSGGC Police Custody Healthcare)			
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	the service. The aim of this is to support improved access to OST in the future for individuals referred to the Police Custody Healthcare service		

NHS Highland	No (Refer to collumn E)	Yes, including OST	Yes	1) A controlled drug licence application has been submitted, inspection was due to take place on 14th March 2023. NHS Highland were given notification from the Home Office of this visit being postponed on Friday 10th March 2023. We are waiting a rescheduled date from the Home Office for inspection to complete the application process, they are aware this is outstanding.	An update from NHS Highland in regards to CD license. NHS Highland controlled drug license for police custody remains outstanding. We have received rescheduled date for inspection from the Home Office, for 12 th September 2023. This will conclude our application process. Scottish Government officials followed up with them on the progress of this on 1 February 2024.	I can confirm we have received our controlled drugs license from the Home Office for Police Custody Healthcare, NHS Highland. This was issued on the 23 rd November 2023.
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NHS	No	Yes	Yes	1) Both Custody	I can confirm that we	The DBS process is
Lanarkshire	(Refer to collumn	There are Standard	Healthcare in	Suites in NHSL	are progressing the	completed for the
Lanarkonno	E)	Operating	Custody in NHS	(Motherwell and	application.	authorised witness
	L)	Procedures that	Lanarkshire is	Coatbridge) do not		to be named on the
		cover Medicine	provided by a limited	have a CD license.	All required named	application.
		Management,	liability company.	Given the guidance	persons have been	
		Substance Misuse	They have held the	issued by Home	instructed to apply	The DBS process
		referrals,	contract since the	Office DOMESTIC	for their DBS check	for the service lead
		Symptomatic Relief	transfer of	CONTROLLED	and we are awaiting	was delayed , but
		for Substance	responsibility to	DRUG LICENSING	updates on	we have had
		Misuse*, Controlled	provide healthcare to	IN HEALTHCARE	individual DBS	assurance that this
		drug management	NHS Boards in 2013.	SETTINGS we are	reference numbers	will be processed
		(detainees own	Initial awareness was	now in the process	in order to progress	and completed
		supply),	given on incident	of seeking a license.	the licence	soon.
		Supervised	recording and	of seeking a neerise.	application.	30011.
		Administration of	adverse events.	As per Application		Once this element
		Opioid replacement		requirements:	Scottish	is completed, the
		therapy,	In light of the HMICS	Meetings held to	Government	application can
		Independent	repot findings, the	discuss identification	officials followed	proceed, with an
		Prescriber nursing*	following actions	of the relevant	up with them on	anticipated timeline
		and Take Home	have been taken:	Managers and	the progress of this	of approx. 12
		Naloxone.		Checking of DBS	on 1 February	weeks for the final
			Discussions have	status (Managing	2024.	element of the
		(* SOP's	been held with the	director, Site		licensing process.
		independently	healthcare provider	Security, legal		31
		signed by Chief	clinical lead on the	compliance and		
		Pharmacist,	need for refresher	Responsibility for		
		Professional	training. This will be	Witnessing		
		Nursing Rep and	discussed with his	Destruction). If no		
		other senior	partners	current DBS held,		
		members of the	• A scoping exercise	then applications		
		Custody offender	will be undertaken to	shall be made. Once		
		management	ensure all staff	this is complete,		

	Group.) The SOP's are reviewed, updated and shared with the Custody Healthcare Operational Group on an annual basis.	 involved in proving healthcare in custody have access to Learnpro The module on Datix recording to be completed by all staff within 3 months Any staff who do not have access to Learnpro will be offered alternative learning Adverse events will be recoded and discussed at the quarterly Custody Healthcare Operational group meeting. A learning cycle will be developed to review any adverse events recorded. 	then the formal application process shall begin. Timescale will be governed by DBS application status and processing- but this is underway.		
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NHS Lothian	Yes NHS Lothian host Police Custody Healthcare services for NHS Lothian, NHS Fife, NHS Forth Valley and NHS Borders. The governance of each area is checked on a rotational basis when the licence needs to be renewed. Governance is underpinned by CD Governance Teams in the Health Board areas, daily/ 72- hour CD checks and a monthly report which feeds into the Health and Safety quarterly report to NHS Lothian Board. Pharmacy ordering and supply for CD schedule 3 drugs	Yes Effective practice. Every detainee who is on prescribed medication is referred to the service using single point referral service. There is no discrimination between essential medications. Missed dose protocols are followed for all medications if relevant. OST collection can be from patient's home or pharmacy if it is supported by corroboration from Emergency Care Summary/ Pharmacist/Patient/ GP.	Yes All staff complete Learn Pro training regarding Datix and significant adverse event reporting. Senior Charge Nurses attend a two- day training for management of adverse events. Datix and understanding of policy is recorded on quarterly Health and Safety Reports which go to NHS Lothian Board via REAS SMT (directorate). Locally, a spreadsheet is updated on a monthly basis and SCNs carry out monthly checks and reports as part of staff management supervision arrangements. Police Scotland and NHS Lothian teams	N/A	N/A	N/A
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NHS Orkney	No (Refer to collumn E)	No (Refer to Collumn E)	Yes NHS Orkney has a series of processes in place to support complaint handling. These are under- pinned by appropriate policies and training. We are currently reviewing our wider Healthcare Governance policies and will be bringing all of these together in one over-arching framework within the next 3 months.	 A decision on whether this is required will form part of a review of the supply of all medications within the custody facility. This work is being undertaken with our colleagues in NHS Shetland and will be in place within 6 months. Completion of these policies will take place on completion of the review. Policies will be in place within 6 months. 	NHS Orkney does not keep controlled drugs within the custody suite. Instead, medicines used for custody healthcare are provided from the Urgent and Unscheduled Care service, and only named patient controlled drugs are kept within the custody suite – an activity that does not require licensing. NHS Orkney therefore does not require a Controlled Drug license for the custody healthcare provision. Unfortunately, following the intent previous email, staff turnover and vacancies have meant that work on procedures has not been progressed	Status: TBC
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		due to loss of the	
		lead. Existing	
		procedures do	
		support medicines	
		supply in the urgent	
		and unscheduled	
		care service,	
		however the service	
		will require to review	
		the custody health	
		processes.	
		Should the delivery	
		context change in	
		Orkney, i.e.	
		controlled drugs	
		schedules 2-4 are	
		stored in the custody	
		suite in a non-named	
		patient basis, NHS	
		Orkney will ensure	
		that a controlled	
		drug license is	
		obtained prior to	
		implementing these	
		changes.	
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		Scottish	
		Government	
		Officials followed	
		up on this	
		information on 14	
		March 2024, to	

		<u>confirm any</u> <u>updates and/or</u> <u>changes.</u>	

NHS	No	No	Yes	1) A decision on	Through review and	This remains the
Shetland	(Refer to collumn	(Refer to collumn	NHS Shetland have	whether this is	establishing a	case in NHS
	E)	E)	trained staff providing	required will form	workstream to	Shetland. NHS
	-/		custody healthcare	part of a review of	review our current	Shetland do not use
			who are competent in	the supply of all	Urgent and	controlled drugs for
			local governance	medications within	Unscheduled Care	the delivery of
			systems including	the custody facility.	services, including	custody healthcare
			complaint handling	At present, the	the provision of	in a way that would
			and adverse event	controlled drugs	custody healthcare,	require a controlled
			recording. The staff	stored within the	all remaining	drug license.
			work with local	custody suite which	controlled drugs are	
			policies and	require home office	being removed from	The designated
			procedures. Local	license are limited to	the custody suite to	lead for urgent and
			clinical governance	benzodiazepines.	be placed within our	unscheduled care
			arrangements	This work is being	acute service, with	continues to review
			provide review of	undertaken with our	appropriate access	and develop
			adverse events and	colleagues in NHS	for staff covering	process and
			assurance.	Orkney and will be	custody healthcare.	procedure, together
				in place within 6	NHS Shetland will	with the pharmacy
				months.	no longer have a	team on the
					need for a Controlled	handling of
				2) Completion of	Drug license for the	medicines in
				these policies will	custody healthcare	Shetland for
				take place on	provision.	custody healthcare.
				completion of the		Further
				review. Policies will	Existing procedures	development work
				be in place within 6	are in place for	on record keeping
				months.	custody health and	is underway too.
					will be updated	There is now better
					throughout the work	integration of urgent
					of the Urgent and	and unscheduled
					Unscheduled Care	care work involving
					workstream as it	custody health

				seeks to combine both custody healthcare and out of hours. We had initially begun the licensing process in registering for access to the application portal and found this challenging to progress quickly. Advice has varied between boards, and I'm aware from other board areas the licensing process has taken longer than anticipated. Should you have any further questions on our approach, please let me know and I'll be happy to discuss. Scottish Government Officials followed up on this	care. There has been excellent regional networking between NHS teams in the North of Scotland, and in particular with NHS Highland and NHS Shetland. Police Scotland colleagues in Shetland have engaged fully with the development process including storage of medicines and access.
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		information on 14 March 2024, to confirm any updates and/or changes.	

NHS Tayside	Yes	Yes. All medication is continued in custody.	Yes all are recorded on Datix, reviewed with the senior team and discussed at the Business & Governance Group.	N/A	N/A	N/A
NHS Western Isles	No (Refer to collumn E)	Yes. We are currently updating our standard operating procedures with the introduction of our Mental Health pathway and Naloxone administering process. To support the issuing of prescribed medications, clinicians working in the service have access to emergency care summary and Adastra.	Yes. Datex is the method used by NHS Western Isles to record any adverse event within the service. This is monitored and assigned to the appropriate senior manager for investigation, route cause analysis and remedial action. Training and system access for Datex is available to all staff in NHS Western Isles.	(1) We do not store controlled drugs within any of our custody suites. Currently any controlled drugs are issued via our Emergency department in Western Isles Hospital or our Community Hospitals in Uist (OUAB Hosptial) & Barra (St Brendan's Hospitals are located closely with our custody suites which prevents any significant delay in access to prescribed medication which is not located in the Custody Suite.	Home Office colleagues have come back and agree that CD licenses are not required in this case	N/A