

**REPLY BY THE PRESIDENT OF
THE COMMITTEE FOR HEALTH & SOCIAL CARE
TO QUESTIONS POSED BY DEPUTY PROW PURSUANT TO RULE 14 OF THE
RULES OF PROCEDURE**

Question from Deputy Rob Prow submitted in accordance with Rule 14

During this political term concerns have been raised in relation to the diversion of prescription medication. This is referenced in the Combined Substance Use Strategy for Guernsey and Alderney 2021-2026 which specifically notes that Guernsey's drug environment is considered unique, with the limited ports of entry combined with vigilant border controls having led to the diversion and illicit supply of some medicines.

Separately, concerns were raised independently to the Committee *for* Home Affairs (the Committee) in the summer of 2023 by its operational services in relation to the apparent unintended consequences of legislative changes permitting local doctors to privately prescribe cannabis based products medicinal (known as "medicinal cannabis") and the import of such products into the Bailiwick for islanders obtaining prescriptions in the UK or Jersey.

As a result of these concerns the Committee has worked with the Committee for Health & Social Care (CfHSC) to consider how to strengthen the collective response to tackling substance misuse and the illegal practice of diversion of prescription medication and the harms that it can cause.

The two Committees sought the advice of the Misuse of Drugs Advisory Group (MDAG). MDAG was established in 2010 to provide independent and impartial advice to the Home and Health Departments of this time and its membership includes professionals and statutory officials from both Committees. Over the last 15 years MDAG have actively supported the development of drug policy; including monitoring the local environment and looking for new trends in drug misuse, with the objective of supporting the health and wellbeing of individuals and keeping the broader community safe.

At the request of the two Committees, MDAG prepared a report titled 'Appraisal into the Reduction of the diversion of Controlled Drugs in the Bailiwick of Guernsey' (the Report) which was considered jointly by the Committees in May 2024. The Report contained a wealth of information, including statistical evidence and intelligence, details of private clinic prescribing practices, the safeguarding framework supporting the issuance of States of Guernsey prescriptions, and an outline of the identified issues with the misuse of drugs and prescription diversion. The Report also identified gaps in data collection and governance structures.

The majority of medicinal cannabis used in Guernsey is prescribed via private clinics on private prescriptions. Unlike all other controlled drugs, there is no regulation on prescribing clinics. Additionally, there is no restriction on total quantity of medicinal cannabis, strengths or formulation of product that can be prescribed. The Report highlights concerns about the

absence of safeguards and regulation around the private prescribing of unlicensed medicinal cannabis.

At the joint Committee meeting held in May 2024 officers were directed to prepare an Implementation Plan to progress the regulation of medicinal cannabis prescribing clinics and controlled drugs. This work was led by the Chief Pharmacist and a report was considered at a joint Committee meeting in October 2024.

The Implementation Plan identified a programme of work, due to commence in December 2024 and be undertaken over 2 years, which would provide a regulatory framework for the prescribing of unlicensed medical cannabis which would ensure compliance with health and safety laws and ethical prescribing practices. It further directed that additional data collection be undertaken to support evidence-based policy development and the establishment of clear communication pathways between stakeholders. It was considered that the development and introduction of a streamlined process for controlled private prescriptions would ensure safety, legal compliance, and ease of access to patients.

The Committee recognises that the policy which provides for private clinics to issue prescriptions for medicinal cannabis is a matter which rests with the CfHSC. However, the unintended consequences of this policy impact on both operational services as well as the health and wellbeing of individuals and the safety and security of the community.

Question

- 1. Can the CfHSC provide a detailed update on progress made to deliver the three objectives identified in the Implementation Plan?**
- 2. Can the CfHSC provide details of the specific identified milestones and timeframe that will support the delivery of each of the three objectives identified in the Implementation Plan?**

Answer to Question 1 from the Committee *for* Health & Social Care

The Chief Pharmacist presented an Implementation Plan on the regulation of Controlled Drugs at a joint meeting of the Committee *for* Health and Social Care and the Committee *for* Home Affairs in October 2024, following work undertaken by the Misuse of Drugs Advisory Group. The Committee *for* Education Sport & Culture was also briefed.

The three objectives set out in the Misuse of Drugs Advisory Report Implementation Plan on the Regulation of Controlled Drugs are set out below.

Objective 1: Regulation of Cannabis Prescribing Clinics on Island

- Create a regulatory framework and legal standards for clinics that prescribe cannabis.
- Ensure clinic compliance with health and safety laws and ethical prescribing practices.

Objective 2: Implementation of Controlled Drugs Prescription Only Medicines Private Prescriptions

- Develop and introduce a streamlined process for Controlled Drugs private prescriptions, ensuring safety, legal compliance, and ease of access for patients.

Objective 3: Establish Pathway/Communication Route for Clinics, Police, and Health & Social Care

- Build a formal communication route for addressing patient interactions with public services, focusing on cases of Controlled Drugs abuse, misuse, or overdose, whether prescribed or not.

An update on progress to date at April 2025 to deliver these three objectives and wider objectives relating to reducing the diversion of other Controlled Drugs such as opioids and gabapentin has been prepared by the Chief Pharmacist and is attached.

Answer to Question 2 from the Committee *for* Health & Social Care

The delivery of the Implementation Plan on the Regulation of Controlled Drugs is a 2-year programme of work scheduled to commence from December 2024. It was envisaged that additional staff would be recruited to take this work forward, including the recruitment of a Controlled Drug Pharmacist.

The Committee *for* Health & Social Care has directed officers to develop a joint implementation plan that will set out the milestones and timeframes to deliver the Misuse of Drugs Advisory Group's Implementation Plan on the Regulation of Controlled Drugs and will also include proposals to implement the wider review of controlled drugs that the Chief Pharmacist has recently conducted. This combined implementation plan will also include measures to control the diversion of controlled drugs other than medicinal cannabis that are available on prescription, such as opioids and gabapentin, this is a serious concern for the Committee for Health & Social Care and needs to be a priority for all committees involved in social policy.

Work to develop that combined implementation plan that will include measures to regulate all controlled drugs is currently being undertaken in collaboration with the Misuse of Drugs Advisory Group. It is anticipated that the specific milestones and timelines will be defined within the first three months once the Controlled Drugs Pharmacist has commenced their post.

Date of receipt of questions: 18 April 2025

Date of response: 2 May 2025

Chief Pharmacist Update – Misuse of Drugs Advisory Group Report

Progress April 2025

This paper provides an update on progress against the Misuse of Drugs Advisory Group objectives and Controlled Drugs related workstreams.

Objective 1: Regulation of Cannabis-Based Clinics on-Island

- Monthly review of the prescribing trends for Cannabis Based Products for Medicinal Use continues, undertaken by the Chief Pharmacist.
- Monitoring of Controlled Drug imports through community pharmacy and patients is ongoing to identify potential trends.
- The Chief Pharmacist is working on the development of a regulatory framework for cannabis prescribing clinics.

Objective 2: Implementation of Controlled Drug Prescription Only Medicine Private Prescriptions

- Work is ongoing in collaboration with the Law Officers and Policy teams.
- Legislative updates are being prepared to support implementation of the introduction of controlled drugs that will be available on private prescription.

Objective 3: Communication and Information Sharing Pathways

- Misuse of Drugs Advisory Group meeting is scheduled for May 2025 to:
 - Clarify roles and responsibilities for information sharing,
 - Map existing pathways and identify gaps,
 - Review and strengthen MDAG membership to support delivery of shared objectives.

Positive Developments

- Prescribing data is being shared monthly and has remained stable over the last six months.
- Open communication has been established with on island clinics who are prescribing cannabis-based medicinal products to raise concerns and work through emerging issues.
- A decrease has been observed in the number of patients being prescribed high volumes of Cannabis-Based Products for medicinal use.
- Constructive dialogue continues around reducing high-THC product prescribing where appropriate.
- Clinics have expressed a clear desire to be part of a more formalised communication and information-sharing process with health and justice stakeholders.

Additional Workstreams:

1. Appointment of Controlled Drugs Pharmacist

- The role has now been advertised for recruitment
- The post requires appointment at a senior pharmacist level due to the complexity and sensitivity of the remit.

2. Review of Controlled Drug Prescribing (excluding Cannabis-based products for medicinal use (CBMPs))

- A comprehensive review of controlled drug prescribing has been undertaken and presented to the Chief Medical Officer and the Committee *for* Health & Social Care.
- Key prescribing trends were identified, including those requiring closer monitoring.
- Data and insights have been shared with Primary Care, including feedback to the top ten prescribers.
- The Chief Pharmacist will present the findings at the next Primary Care Governance meeting.