



SQP: prescribing and authorisation of supply

Relaxation of enforcement during COVID-19

Regulations for Suitably Qualified Persons (SQP)

Veterinary Medicines Regulations 2013 – Schedule 3 paragraph 14. In particular:

(4) A suitably qualified person may only supply a veterinary medicinal product classified as POM-VPS, NFA-VPS or AVM-GSL, and may only supply it from—

(a) premises approved by the Secretary of State as being suitable for the storage and supply of veterinary medicinal products by a suitably qualified person;

(b) premises registered as a pharmacy with the General Pharmaceutical Council or with the Pharmaceutical Society of Northern Ireland; or

(c) practice premises registered under these Regulations as being premises from which a veterinary surgeon supplies veterinary medicinal products.

(5) A suitably qualified person who supplies a product classified as POM-VPS or NFA-VPS must either—

(a) hand over or despatch the product personally;

(b) ensure that, when the product is handed over or despatched, the suitably qualified person is in a position to intervene if necessary; or

(c) check the product after it has been allocated for supply to a customer, and be satisfied that the person handing over or dispatching it is competent to do so.

During the COVID-19 pandemic

Effective immediately, in view of the unique challenges caused by the COVID-19 pandemic, the Veterinary Medicines Directorate (VMD) will adopt the approach set out below to the enforcement of the above requirements until 30 April 2020 – and given the current uncertainties, this date may be amended by further notice from time to time. In practice, this means that during the current period SQPs will be allowed to prescribe and authorise supply remotely.

The VMD will not issue an improvement notice in respect of a breach of paragraph 14(4) and (5) of Schedule 3 to the Veterinary Medicines Regulations 2013 (VMR) during this period, in cases where the following procedures are observed.

The SQP is still responsible for the prescription and supply and therefore must:

- be the person that has the conversation/consultation with the animal owner;
- be the person that makes the prescribing decision;
- be satisfied that the person handing over or dispatching the prescribed product is competent to do so.

The SQP must then instruct (in writing or orally) the person at the premises from which the physical supply is to be made (which must be premises falling within paragraph 14(4)(a) to (c)) to hand over or dispatch the specific medicine that the SQP has prescribed.

SQPs must record details of their conversations with clients, including the information gathered on which their prescribing decisions are based, so they can ensure consistency with their own records and the records of the supplies at the relevant approved SQP retail premises/pharmacies/veterinary practice premises. If they're orally instructing a person at those premises to hand over/dispatch the product, the SQP must also record that person's name, the date and time, and their prescribing instructions. The documentation and records must be kept for at least 5 years.

For the avoidance of doubt, the VMR continue to apply. This is a statement of a temporary VMD enforcement policy in relation to specific obligations under the VMR only. The VMD may continue to take action to enforce those obligations in cases where the procedures described above are not followed.