



Issue: Non staff witnessing of Drug Registers

Raised by: Sue Dubow (RAN, Batchelor HC)

Background: Raised that if non staff are asked to countersign ("witness") entries in Restricted Schedule 4 (RS4) drug registers, this constitutes a breach of client confidentiality. Questioning if witnessing should only be made by staff members.

Discussion: It is acknowledged that where a "witness" signed the register there is the potential for them to view other clients who may have received that medication previously.

Where other clinical staff are present, another staff member is obviously the person to witness supply, and where relevant, administration, of S8 or RS4 medications.

Section 41 of the NT Poisons and Dangerous Drugs Act (PADDA) states that "*a third person capable of reading English (must be) present to witness that administration or supply*" and hence it is a breach of legislation to supply S8s without a third party witness. It should be appreciated the unique provision the PADDA offers for the NT in allowing a non-staff person to witness the count is actually providing a safeguard that allows remote staff to be able to administer S8s, where solo practice is so often the scenario.

However, as noted in the relevant Atlas items, if the staff member is truly working alone, there is the obligation to perform a drug count with a second staff member a.s.a.p. after that scenario.

While strictly not a legislated requirement for RS4s, Remote Health adopts the same principle in maintaining the RS4 register, as for S8s. This will help prevent health staff from being accused of misappropriation of the medication. (Note, the current version of the Atlas item "Restricted Schedule 4 Medications" indicates the PADDA requires witnessing of the RS4 medications supplied. This is an error; the requirement is a Remote Health Branch ruling rather than legislated, and the Atlas item will be amended accordingly)

Therefore, it is supported that non staff members be utilised to witness RS4 or S8 supply, in situations where other staff members are not present.

The concern regarding witnessing of other confidential information is a valid concern, but is best addressed by noting the potential and ensuring this information is covered when utilising members of the public to countersign in a drug register.

Consultation: Within Best Practice Group

References:

- Atlas items: Schedule 8 Medications; Restricted Schedule 4 Medications
- Northern Territory Poisons and Dangerous Drugs Act 2005

Outcome: The practice of utilising a non staff third party to witness supply of S8 or RS4 medications, and sign the relevant drug register, should continue to occur when other staff members are not present.

Care should be taken to cover earlier entries in the register to prevent the divulgence of other confidential client information.