

Guidance on the reporting, recording and investigation of suspected prescription fraud for the Dental Out of Hours service.

Background

Health and Social Care (HSC) as an organisation has a zero tolerance approach to fraud. It is the current position that all incidents of suspected prescription fraud will be examined by Counter Fraud Services (CFS) and the appropriate clinical leads within the Strategic Planning and Performance Group (SPPG) to provide assurance that HSC is meeting its statutory obligations in respect of patient safety and the safeguarding of public funds.

What is prescription fraud?

This term is used by CFS to refer to a group of related fraud offences that are committed by a small minority of service users within Northern Ireland. Typically these offences involve the person(s) practising some form of deception or forgery, or a combination of both in order to obtain medication in greater quantities than originally prescribed or to obtain medication that was not prescribed to them at all. The patient may either be obtaining the medication to consume themselves or to sell onto others.

What are the dangers?

This group of activities may seem at first glance to be of little importance as the actual cost of the medication obtained is usually of fairly low value but this is somewhat misleading.

The most common offence committed is Fraud by False Representation (S2 Fraud Act 2006) which is a criminal offence with potentially heavy penalties available, dependant on circumstances, to Judges at sentencing.

This is exacerbated by the potential for reputational damage to the HSC and individual practices and pharmacies if our systems and procedures allow a member of the public to obtain prescription drugs in quantities that are threatening to their health, and in extreme cases to their life.

This combination of criminal activity linked to potentially harmful activity means that the HSC must develop and enforce robust governance measures to limit the opportunities for this type of activity.

There is also the potential for risk to the perpetrator, either to their own health as a result of taking medication that was not prescribed for them or to the health of others if they are obtaining the medication for diversion to others.

What to look out for

Due to the restricted controls on what the Out of Hours service may prescribe i.e. pain relief, it is anticipated that the fraud will fall in two broad categories.

Altered Prescriptions

A prescription issued in good faith by a Dental Prescriber may be detected at the point of dispensing as potentially being fraudulent due to:

- the prescription having been manually altered to increase the quantity and/or strength of the medication prescribed;
- the addition of an item of medication likely to cause dependence or misuse.

The patient will initially present with pain (whether this may/may not be genuine) and/or other related issues in order to obtain medication and follow it up with one or both of the methods highlighted above.

Theft of Prescriptions

Another common thread of activity observed among this small group of individuals is the opportunistic theft of prescriptions. They will use any opportunity that presents itself to obtain blank and/or completed prescriptions and as such prescription security is an area that requires constant vigilance.

Unless Dental OoH learn of the theft through their own systems they will only become aware of the situation when they are contacted by a Pharmacy or BSO/SPPG employee or PSNI to inform them that one of their prescriptions has been used in a potential fraud. This would normally be when a stolen script is later presented for dispensing.

What actions can a Dental Out of Hours service take?

- take steps to ensure that there is limited opportunity to add drugs or alter the details on the script where practicable by use of ruling off.
- take steps to ensure that blank and completed prescriptions are stored safely (refer to the Prescription security protocol).
- consider a policy whereby only the Prescriber can hand write prescriptions, thus making any alterations more obvious at the point of dispensing.
- ensure that any CCTV recordings (if available) which may show the incident are retained and not routinely copied over; this may become vital in order to identify the suspect at a later date.
- take steps to secure any primary records which may confirm the actual medication prescribed.
- if your Dental OoH service believes it has been a victim contact CFS to discuss your concerns and report the matter, if appropriate.
- report all confirmed instances of prescription fraud to the PSNI on 101 (or 999 if an emergency), as these are criminal offences.
- any information that can identify the time frame of the theft is also highly valuable as it provides parameters for any follow up action.

How to report suspected prescription fraud

If you suspect that fraudulent activity may be occurring please contact Counter Fraud Services on **0800 096 33 96** to discuss your concern or complete our online reporting form at cfs.hscni.net/report/prescriptionfraud

All confirmed instances prescription fraud should be reported to the Police on 101, or 999 in the case of an emergency.