



Medicines Management and Prescribing Policy

Summary	This policy sets out Capmed Diagnostics arrangements for safe medicines management specific to Capsule Endoscopy preparation, aligned with CQC expectations. Only medicines required for preparation will be used.
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Version Control

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Introduction

Medicines Management encompasses the way medicines are selected, procured, delivered, prescribed, prepared, administered, reviewed and disposed of, to optimize the contribution that medicines make to producing informed and desired outcomes of patient care (Audit Commission 2001). Medicines management includes the clinical, cost effective and safe use of medicines within the health system to help patients get the maximum benefit from the medicines they need, while at the same time minimising potential harm.

Capmed Diagnostics Ltd, herein referred to as the company, is committed to ensuring that all medicines used in the delivery of procedures are used in a safe and effective way that minimises risks to both patients and staff. The company delivers a very specific portfolio of tests and therefore only medicines that are related to the successful delivery of these tests should be prescribed. This policy outlines safe management of medicines used solely for Capsule Endoscopy preparation, in line with CQC Regulation 12 requirements for safe care and treatment.

Scope

This policy applies to all activities related to prescribing, supply, delivery, and use of CE preparation medicines.

The policy is limited to non-invasive procedures, and the company expressly forbids the prescription of medicines that are not related to the delivery of CE procedures.

Definitions

Term	Definition
Medicines Management	Process ensuring safe, effective use of medicines.
CE	Capsule Endoscopy
Online Pharmacy	Registered pharmacy providing distance services generally via electronic methods e.g. over the internet.
Summary of Product Characteristics	is a comprehensive document that provides essential information about a medicinal product, including its uses, dosage, and safety information.

Roles and Responsibilities

Prescribers

The company expects prescribers to;

- Apply the relevant parts of this policy to their practice.
- Comply with appropriate legislation, professional guidance, company standards and prescribe within their competence. They must take account of Summary of Product Characteristics (SPC), the evidence / expert opinion and the patient's condition when selecting the medicine to prescribe.
- Clearly identify themselves throughout the prescribing process.
- Verify that the correct prescription has been submitted for the correct patient as documented in the patient's clinical records.
- Check and approve any prescriptions that have been organised by administrators as part of the patient's pathway.

Online Pharmacy

To obtain access to medicines required for the delivery of CE, the company will enter into a commercial arrangement with an online pharmacy. As part of the contract between the company and the online pharmacy the company makes clear that the online pharmacy is responsible for;

- Verification of prescriptions sent on behalf of the company.
- Managing the stock of medicines held in the pharmacy and their preparation into user ready presentations with appropriate documentation.
- Ensuring delivery to the patient outlined in the prescription.

Administration Staff

Prepare prescriptions and submit to the online pharmacy in preparation for checking by clinicians. Administrative staff should ensure that they abide by the contents of this policy and any terms and conditions imposed by the online pharmacy.

Administrative staff are not permitted, under any circumstance, to approve prescriptions on behalf of a clinician whether consent for approval is expressly given or implied by the clinician.

Procedures and Processes

The company provides a tight portfolio of CE procedures and only medications related to the delivery of these procedures should be prescribed.

1. Prescribing Medicines

Medicines may only be prescribed via the electronic prescribing system

- Provided as part of any electronic patient management system.
- Portal provided by the Online Pharmacy.
- Business continuity method outlined by the Online Pharmacy in the event of failure of either of the above methods of prescribing.

The company does not possess, or condone the use of, paper-based prescribing stationary unless used as a business continuity method by the Online Pharmacy.

2. Authorised Prescribers

The following registered healthcare professionals may prescribe using company resources to patients being treated by the company, within the confines of their competence, guidelines and Department of Health guidance:

- Medically qualified doctors that are delivering CE procedures on behalf of the company and have an active individual/organisational Service Level Agreement with the company.
- Independent non-medical prescribers – In the context of this policy within the company this is limited to a registered nurse having undergone an accredited program for independent prescribing and having passed the relevant assessments. This must be in accordance with their stated personal scope of prescribing practice and area of competence and in line with the relevant acts of parliament.

No other staff may prescribe.

3. Medicines Available for Prescribing

Prior to prescribing, the prescriber

- should obtain an accurate record of the patient's current medications to ensure that medicines prescribed correspond, where appropriate, to those that the patient was already taking.
- document any allergies within the patient's care record and check to ensure that the patient is not allergic to any of the medicines prescribed.
- Ensure that the dose of medicine prescribed is appropriate for the patient considering factors such as weight alongside any other medical symptoms e.g. constipation.

Only medicines related to CE preparation should be prescribed.

4. Prescribing for people with close personal relationships

The company accepts that on occasion a patient may be somebody with whom the prescriber has a close personal relationship. In the context of this policy a close personal relationship would be colleagues, friends and family.

In this instance the prescriber should ask another clinician, who does not have a close personal relationship with the patient, to prescribe any CE preparation medicines.

If there is no other clinician available, and the CE procedure is deemed necessary within the timescale before another clinician is available, then the prescriber is able to prescribe on the understanding that the potential conflict of interest is documented in the patient's clinical notes and the patient is fully aware of, and consents to, the situation.

The company points out that the timescale for delivery of the CE procedures delivered is treated as a diagnostic test and therefore the standard diagnostic target of 6-weeks is applicable. Therefore, in the context of this policy it is highly unlikely that another prescriber that does not have a close relationship, would be unavailable for 6 weeks. The company accepts that whilst these circumstances may arise, the chance of occurrence is rare and therefore **the need for a prescriber to prescribe medication for people with whom they have a close personal relationship is also rare and should be avoided.**

5. Dispensing Medicines

Prescriptions will be submitted electronically to the company nominated online pharmacy via the methods outlined in this policy. The prescriber should be contactable if the online pharmacy has any queries relating to a specific prescription and should answer any queries within a timely manner so as not to delay onward care of the patient.

The online pharmacy is responsible for dispensing the prescribed medicines, delivery accuracy and verification safeguards.

6. Medicine Storage

Patients receive medicines directly from the nominated online pharmacy. The company does not store any medicines.

7. Administration of Medicines

Patients are responsible for self-administration of all prescribed medicines in accordance with the instructions issued at the time of prescribing.

A patient will be deemed competent to self-administer the prescribed medication if they are able to give consent to continuing treatment as outlined in the company **Consent to Examination or Treatment** policy.

8. Controlled Drugs and other Drugs Subject to Special Restrictions

The term “Controlled Medicine” is used to define a medicine or groups of medicines to which enhanced control of prescribing, supply and administration is applied due to the potential for inappropriate use or misuse.

The company **does not** carry out any investigations or procedures that require the use of “Controlled Medicine” and prescribers are not permitted to prescribe any drugs that would be categorised as a “controlled drug” by the Misuse of Drugs Regulations 1985 (as amended).

9. Disposal of Medicines

The prescriber will only prescribe medicine of the required amount to prepare the patient adequately for the specific CE procedure. In most cases this means that there will be no leftover medicines. However, in some instances patients may be unable to tolerate the full preparation regime and hence may have a small amount of preparation medication leftover.

Disposal of any prescribed medicines would be in line with guidance issued by the online pharmacy.

Patients should be advised to bring any remaining prescribed medicines as part of the CE preparation process to their face-to-face clinic appointment, and the company will be happy to accept the return of any medicines prescribed by the company, via the clinic appointment. The receiving member of the team must ensure they follow disposal instructions as given by the online pharmacy.

10. Medication Errors

A medication error is a preventable incident associated with the use of medicines that result in harm or potential for harm to a patient. Such incidents may be related to any step in the medicine use process. This includes, prescribing, dispensing and administration of the medicine as well as the transfer of information. Inappropriate omission of a dose is also considered to be a medication error.

All medication errors must be reported to the Directors as an incident in line with the company complaints and incident reporting policy.

The wellbeing of the patient is of prime importance following a medication error and the company expects that this is prioritised in any subsequent actions. The prescriber should be notified of any error, and an anticipatory investigation should take place in line with the company complaints policy.

11. Medicine Defect Reporting

A defect is present where the product, as supplied by the manufacturer, is not of the expected standard. Defects may involve, for example, inadequate or incorrect labelling, ineffective packaging, contamination or discolouration of the medicine, broken tablets etc.

If a defect is suspected, then the patient should escalate to either the company or the online pharmacy via contact methods publicised on the company website.

If the patient escalates to the company, then the company has a responsibility to contact the online pharmacy to check if the medicine is defective, unless a previous conversation (verbal or electronic) has already taken place and the online pharmacy is able to confirm that the medicines received by the patient are not defective. For example, if there has been a change in the formulation of a bowel preparation medication which means it is a different colour.

12. Product Recalls

The company would ordinarily be notified of any product recalls by the online pharmacy.

If the company is notified of a defective product, the company will endeavour to contact all patients where there is a risk that they have received the medicine which is part of the recall.

This will be done via email, text and phone until the company is able to verify that they have spoken with the patient and the medicine that they are in possession of either is or is not part of any affected batch. For example, verification of a batch number.

The company will be happy to arrange collection of the recalled batch of medicine and replacement within a timely manner so as not to affect the patients booked appointments. This collection and/or replacement may be carried out by the online pharmacy on behalf of the company.

13. Adverse reactions

An adverse drug reaction is an unwanted or harmful reaction experienced following administration of a drug (or combination of drugs) and is suspected to be related to the drug. The reaction may be a known side-effect or may be new and previously unrecognised.

Practitioners must report adverse effects of any CE preparation medication, and no further treatment should continue until it is verified that it is safe to do so. If treatment cannot continue due to adverse reaction, then any charges for care will be as disclosed in the company **Terms and Conditions of treatment** policy.

The clinician responsible for the care of the patient will be notified of the adverse reaction. If the patient is a self-referral, then the GP of the patient will be notified of the adverse reaction.

It may also be appropriate to report an adverse reaction to the Medicine's and Healthcare products Regulatory Agency (MHRA). Reports should be made online at www.mhra.gov.uk/yellowcard or via the yellow card app.

Reports may be completed by doctors, nurses, pharmacists, patients and carers. If a report is made this should be documented in the patients care record.

Reports should always be made to the MHRA for serious suspected reactions (even if well recognised), including those that are fatal, life-threatening, disabling, incapacitating, or which result in or prolonged hospitalisation.

14. Unlicensed Medicines

The company does not permit the use of unlicensed medicines as part of the CE preparation procedures.

The company also does not permit the use of medicines for purposes other than what they are licensed for.

15. Consent to treatment

It is a legal and ethical principle that valid consent must be obtained before starting treatment or physical investigation or providing personal care for a patient. Wherever possible the medicines proposed to treat a patient should be discussed with patient. The discussion should be carried out in such a way that the patient understands that treatment that is proposed and is able to express agreement or disagreement.

Consent for treatment with prescribed medications should be obtained as per the company **Consent to Examination or Treatment** policy.

16. Patient Information Leaflets

Patients have a right, established under European Law, to receive a copy of an official patient information leaflet where one exists.

Patients will receive such leaflets as part of the supply of their medication from the online pharmacy. The company may also provide links to electronic copies of leaflets on the company website (or other websites) if appropriate.

If patients require an information leaflet about other medication these can be obtained from <http://www.medicines.org.uk/emc>

Compliance and Enforcement

Any medication errors, as defined by this policy, will be investigated and documented and discussed as part of a standing agenda item within the directors meeting.

As part of the monthly reconciliation process an itemised list of the drugs prescribed will be requested from the online pharmacy. All drugs prescribed will be verified to ensure that they are part of the current clinical protocols used by the company in CE preparation.

Any drugs identified that are not part of the normal CE preparation regime will be highlighted, and the identified prescriber may have access suspended until the discrepancy is able to be investigated.

Related Policies

- [Consent to examination or Treatment Policy](#)
- [Terms and Conditions of Treatment policy](#)
- [Quality and Governance Policy](#)