

**From:** ACMD  
**To:** Guy Davies  
**Cc:** ACMD  
**Subject:** RE: Regulation 28 report on the death of Helen Louise Spicer

Dear Mr Davies,

Thank you for setting out your concerns in the Regulation 28 notice about a death which involved the unintentional overdose of morphine sulfate oral solution [REDACTED].

The role of the Advisory Council on the Misuse of Drugs (ACMD) is to keep under review the situation in the UK with respect to drugs which are being or appear to them likely to be misused and of which the misuse is having or appears to them capable of having harmful effects sufficient to constitute a social problem.

Firstly, I would like to set out the work which has already been completed by the ACMD on this important issue. In 2016, the ACMD published a major report on diversion and illicit supply of medicines [REDACTED]. One of the recommendations in that report concerned setting up a monitoring system for emerging prescribed substances with the potential for diversion and illicit supply. The ACMD's Secretariat has recently developed a standard operating procedure and a watch-list for medicines misuse as proposed in the report above which will be overseen by the ACMD's Technical Committee going forward. In fulfilment of that recommendation, a number of Government departments have agreed to provide information relevant to misuse of prescription medicines and to make this information available to the ACMD.

I would like to assure you that there are currently actions being taken forward by the ACMD.

The ACMD has published a standard operating procedure on the use of evidence in ACMD reports. This SOP details how the ACMD collects, analyses and presents evidence in reports, available at: [REDACTED]

The Regulation 28 notice was discussed at a recent ACMD Full Council meeting, where the ACMD agreed that there was a need to gather more information on the scale of the issue, being mindful of the legitimate use of morphine sulfate solution. The ACMD has interaction with the MHRA through representation at ACMD meetings and data provided from the Yellow Card System. The MHRA are able to raise any issues concerning misuse of medicines to the ACMD. The ACMD will also request information from DHSC and NHS-E&I regarding patient safety incidents recorded throughout the National Reporting and Learning System (NRLS) to help us assess the evidence.

Best regards,

[REDACTED]  
Secretary to the ACMD