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# Code of Practice for the Storage and Transport of Drugs of Dependence

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Version 2.0



Government  
of South Australia

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## Preface

The *Controlled Substances Act 1984* (the Act) establishes a framework for the regulation of drugs, poisons, pesticides and other prohibited substances in South Australia.

For the purposes of the Controlled Substances (Poisons) Regulations 2011 (the Poisons Regulations), a person storing or transporting a drug of dependence must comply with the Code of Practice for the Storage and Transport of Drugs of Dependence (the Code) as published by the Department.

For the purposes of this Code, drugs of dependence are referred to as Schedule 8 (S8) drugs.

The Code is published for the purposes of section 25 and 26 of the Act and Regulations 27 and 29 of the Poisons Regulations and outlines the mandatory requirements to comply with the Act and Regulations.

The Code is to be read in conjunction with the relevant provisions of the Act and the Regulations.

## Object

The object of the Code is to minimise the risk of Schedule 8 drugs being misused, abused or diverted.

## Application

The Code applies to the storage and transport of all S8 drugs except for the possession of S8 drugs by a person, or a person acting on their behalf, when the S8 drug has been lawfully prescribed or supplied.

This Code specifies minimum requirements however, the following should be considered when planning how to securely:

1. **store** S8 drugs:
  - the type and quantity of the drugs being stored
  - the location and layout of the S8 safe and premises
  - the warning devices and detectors that the S8 safe and premises or vehicle has
  - the number and frequency of transactions
  - the number of persons who will require access to the S8 safe, and
  - the structural integrity, location and design of the building or vehicle.
2. **transport** S8 drugs:
  - the quantity of drugs being transported
  - how the drugs will be packaged
  - the security measures during transport
  - the number of persons who will handle the drugs, and
  - how theft or loss during transport will be identified.

## Compliance with the Code

### Part one | Storage of Schedule 8 drugs

Describes the outcomes that a S8 safe must achieve, and the minimum requirements that must be met or exceeded to demonstrate achievement of that outcome.

## Part two | Transport of Schedule 8 drugs

Describes the outcomes that a person transporting a S8 drug must achieve, and the minimum requirements that must be met or exceeded to demonstrate achievement of that outcome.

## Part one | Storage of Schedule 8 drugs

### General requirements for a Schedule 8 drug safe

A safe must **meet or exceed ALL Outcomes**

- **To meet Outcome 1 a safe must meet or exceed ALL the minimum requirements for the relevant type of safe.**
- **To meet Outcomes 2 and 3 a safe must meet or exceed ONE OR MORE of the minimum requirements.**

**Table 1: General requirements for a Schedule 8 drug safe**

Outcome	Minimum requirements	Check Box
<p><b>Outcome 1.</b></p> <p>The safe restricts unauthorised access to the contents of the safe.</p> <p><i>(must meet or exceed ALL minimum requirements for the relevant safe type)</i></p>	<ol style="list-style-type: none"> <li>1. If the S8 safe is a <b>free-standing or built-in safe</b>, other than an electronic storage and supply unit (ESSU), the safe has the following body, door, and lock properties:               <ol style="list-style-type: none"> <li>i. constructed of mild steel plate of not less than 10 mm thickness; and</li> <li>ii. constructed with continuous welding of all joints; and</li> <li>iii. fitted with a door constructed of mild steel plate of not less than 10 mm thickness, swung on hinges that do not allow the door to be opened if the hinge is removed, the door being flush fitting with a clearance around the door of not more than 1.5 mm when closed; and</li> <li>iv. fitted with a fixed locking bar, welded to the inside face of the door near the hinge edge, which engages in a rebate when the door is closed; and</li> <li>v. fitted with a 6-lever lock or 4-wheel combination lock securely fixed to the rear face of the door, or an electronic lock that provides equivalent security.</li> </ol> </li> <li>2. If the S8 safe is a <b>secure room</b> in a hospital in an area always personally supervised by an authorised person, the S8 safe:               <ol style="list-style-type: none"> <li>i. must have a hardwood, metal, reinforced glass, or similarly strong door; and</li> <li>ii. be restricted by a key; or with electronic access that records the person who entered with a timestamp, and</li> <li>iii. must be covered by closed circuit television that has vision of the entry and exit points.</li> </ol> </li> <li>3. If the S8 safe is a <b>vault or strongroom</b>, the safe:               <ol style="list-style-type: none"> <li>i. is considered to have a resistance grading of at least VII in accordance with AS/NZS 3809:1998 Safes and Strongrooms; and</li> </ol> </li> </ol>	

- ii. is situated away from the external walls of the premises, unless the external walls are constructed of thick concrete, such as Besser blocks, or security measures can be adopted as part of a newly constructed building to mitigate risks.
4. If the S8 safe is an **ESSU**, the safe:
- i. restricts access to the stored S8 drugs to those persons who are authorised to possess the S8 drugs; and
  - ii. requires a person to use their own unique access code and password or biometric identifier to access the safe; and
  - iii. has functioning in-built features that record and report access, attempted access and discrepancies; and
  - iv. gives visual, electronic, and/ or audible alerts if it is left open, damaged, or disconnected from the power supply; and
  - v. automatically locks after a pre-determined period of inactivity when current user fails to logout; and
  - vi. automatically locks if the power is disconnected; and
  - vii. can generate reports or notices of security breaches including attempts at unauthorised physical access or interference with pre-programmed settings.
5. If the S8 safe is a **hardwood or metal cabinet, chest, trolley, drawer, a compartment of a vehicle, or a bag** the safe is lockable; and
- i. may only be used to store a maximum of 30 doses in total;
- OR
- ii. if the safe is only used to store MATOD drugs, may only be used to store an amount that is no more than what will be reasonably required during the working day.
- Note - Outside of operating hours, or if the pharmacist or other authorised person is not present at the place, this alternative storage arrangement ceases to be acceptable and the MATOD drugs must be returned to an S8 safe that meets the requirements in 1 to 3 above.*
6. If the S8 safe is a **refrigerator**, the S8 safe;
- i. is not used to store any other item that is not a drug; and
  - ii. is lockable, or in a lockable hardwood or metal cabinet or strong room.
7. If the S8 safe is a **locked receptacle inside a refrigerator**, the safe;
- i. is securely attached; and
  - ii. is not used to store any other item that is not a drug.



<p><b>Outcome 2.</b></p> <p>It is not possible to easily remove an S8 safe from the premises in which it is located.</p> <p><i>(must meet or exceed at least one minimum requirement)</i></p>	<p>The S8 safe:</p> <ul style="list-style-type: none"> <li>i. weighs more than 350kg; or</li> <li>ii. is securely attached to the premises; or</li> <li>iii. is a built-in safe, vault, strongroom or other similarly secure room that cannot be physically moved as it is part of the premises; or</li> <li>iv. has electronic tethering that is continuously monitored; or</li> <li>v. if the safe is mobile, is located in a building of a hospital occupied by authorised persons 24 hours a day, with a security presence; or</li> <li>vi. is concealed and secured to, or in an irremovable compartment of, a vehicle, vessel or aircraft that is locked when not in use; or</li> <li>vii. is always personally supervised by an authorised person; or</li> <li>viii. if an RFDS medicine chest, is kept in a room with limited access.</li> </ul>	
<p><b>Outcome 3.</b></p> <p>Unauthorised access, or attempted access, to the S8 safe is readily detectable.</p> <p><i>(must meet or exceed at least one minimum requirement)</i></p>	<p><b>Either:</b></p> <ul style="list-style-type: none"> <li>1. The S8 safe is: <ul style="list-style-type: none"> <li>i. always personally supervised by an <b>authorised person</b>; or</li> <li>ii. covered by movement detectors that are continuously monitored; or</li> <li>iii. covered by closed circuit television that has vision of the front and at least one other unobscured angle of the S8 safe and recordings are retained for at least 60 days; or</li> <li>iv. in a locked room or pharmacy: <ul style="list-style-type: none"> <li>a. that has a monitored alarm system that will detect unauthorised entry to the room or pharmacy; or</li> <li>b. with all its entrances covered by closed circuit television and recordings are retained for at least 60 days; or</li> <li>c. that has access that records the person, or the access key used to enter the room and the date and time of entry; or</li> </ul> </li> <li>v. in a South Australian Ambulance Service (SAAS) vehicle.</li> </ul> </li> </ul> <p><b>OR</b></p>	

	<p>2. If no more than 30 doses of all S8 drugs in total are kept at the premises, the safe (which complies with minimum requirements in Outcome 1) is in a locked room.</p> <p>OR</p> <p>3. If no more than 6 doses of all S8 drugs in total are kept in the S8 safe and these drugs are only for use in an emergency, the S8 safe is regularly physically checked.</p>	
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## Preventing unauthorised access to Schedule 8 drug safe

**Table 2. Schedule 8 safe access requirements**

**ALL minimum requirements must be met or exceeded for EVERY Outcome.**

Outcome	Minimum requirements	Check Box
<p><b>Outcome 1.</b></p> <p>Access to the content of the S8 safe is restricted to those persons who are authorised to possess S8 drugs.</p>	<p>The safe is:</p> <ul style="list-style-type: none"> <li>i. accessible only by authorised persons working at the premises where the S8 safe is located, and</li> <li>ii. not accessible by members of the public, and</li> <li>iii. kept securely locked when not in immediate use.</li> </ul>	
<p><b>Outcome 2.</b></p> <p>Records of access are maintained.</p>	<ul style="list-style-type: none"> <li>1. Records must be maintained of the authorised persons who have been given access to the S8 safe at the place, and if relevant, the username, serial number, key number, or other identifier for the person or key.</li> <li>2. Access to the S8 safe using an electronic key must be recorded with the authorised person’s name or other identifier and time of access where possible, with the information kept for at least 2 years.</li> </ul>	
<p><b>Outcome 3.</b></p> <p>Keys are secured.</p>	<ul style="list-style-type: none"> <li>1. For a S8 safe accessible by a <b>physical key</b>, including a swipe card, fob, wristband, or other device: <ul style="list-style-type: none"> <li>i. Any key, swipe card or other device must not have any marking on it, or attached to it, to identify it opens the S8 safe.</li> <li>ii. Any key, swipe card or other device must not be kept with the S8 safe but with an authorised person or in another secure location.</li> <li>iii. If a key, swipe card or other device is kept in another secure location, then the key or access to that location must be changed periodically and whenever an authorised person has their access to the S8 safe removed.</li> </ul> </li> </ul>	

- iv. Any key, swipe card or other device must be returned as soon as possible once the authorised person no longer works for the entity or no longer requires access.
- 2. For an S8 safe accessible by an **electronic key**, such as a password, code, biometric and other electronic key, or a device e.g. an authorised person's mobile phone:
  - i. If access to the S8 safe is via a person's unique code, biometric information, username and password combination or other electronic key, or with an authorised person's own device set up to allow access, e.g., an authorised person's mobile phone with access enabled using near field communication (NFC) connectivity:
    - a. An authorised person must not allow another person to use their username and password, code or other secure key or biometric information; and
    - b. A person's access to the safe must be removed as soon as possible once the authorised person no longer works for the entity or no longer requires access.
  - ii. If access to the S8 safe is via a shared electronic key or similar, the shared key must be changed within a reasonable timeframe whenever an authorised person no longer works for the entity or no longer requires access.

## Part two | Transport of Schedule 8 drugs

**Table 3. General requirements for transport of Schedule 8 Drugs****ALL minimum requirements must be met or exceeded for EVERY Outcome.**

Outcome	Minimum requirements	Check Box
<p><b>Outcome 1.</b></p> <p>Unauthorised access, or attempted access is readily detectable.</p>	<p>Only an <b>authorised person</b> at the premises can access S8 drugs including when packaging for transport or receiving supplied S8 drugs.</p> <p>The packaging is:</p> <ul style="list-style-type: none"> <li>i. secure and will show visible signs of unauthorised access, or attempted access, and</li> <li>ii. clearly labelled with the name of the purchaser of the drug and street address for delivery</li> </ul> <p><i>Note – Purchaser includes a person who makes an order for a drug (eg. Transfer between pharmacies).</i></p>	
<p><b>Outcome 2.</b></p> <p>It is not easy to identify S8 drugs during transport.</p>	<p>The packaging does not identify the contents as S8 drugs.</p> <p>Other items are not included in a package that contains a S8 drug.</p>	
<p><b>Outcome 3.</b></p> <p>S8 drugs must be delivered, and received by, a person authorised to possess S8 drugs.</p>	<p>S8 drugs must be delivered to the street address on the packaging for the stock.</p> <p>S8 drugs must not be left at the premises unless a written receipt acknowledging delivery of the S8 drugs is obtained from:</p> <ul style="list-style-type: none"> <li>i. the person named on the packaging for the stock, or</li> <li>ii. an authorised person at the premises acting on behalf of the person named on the packaging for the stock.</li> </ul>	
<p><b>Outcome 4.</b></p> <p>Access to S8 drugs is monitored during transport.</p>	<p>A signature must be obtained from the recipient each time the stock changes hands, with receipts exchanged.</p> <p>S8 drugs must not be left in vehicles overnight or when the vehicle is unattended unless secured in a premises fitted with an alarm system monitored by a security company or patrolled by a security guard.</p> <p>S8 drugs must not be left unattended, other than in a S8 safe.</p>	

<p><b>Outcome 5.</b></p> <p>A suitable carrier must be used to transport S8 drugs.</p>	<p>A person must not engage a carrier to deliver stock of a S8 drug unless they reasonably consider the carrier can comply with the requirements in this Code.</p>	
<p><b>Outcome 6.</b></p> <p>Theft or loss of S8 drugs during transport must be easily identified.</p>	<p>If a discrepancy is identified during transport or receipt of S8 drug stock:</p> <ul style="list-style-type: none"> <li>i. the supplier must immediately be notified, and</li> <li>ii. where an unaccounted loss cannot be reasonably explained or theft is suspected, a report should be made to South Australia Police and to <a href="#">Controlled Substances Licensing</a>, Department for Health and Wellbeing.</li> </ul>	

## Glossary

The following definitions apply for the Code:

Term	Definition
<b>Ambulance</b>	As defined in Section 3 of the <i>Health Care Act 2008</i> .
<b>Authorised person</b>	A person who has been endorsed, empowered, or permitted by proper authority to act. For example, an employee of a company responsible for ordering and receiving stock.
<b>Dentist</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .
<b>Dose</b>	For divided preparation (for example, tablets, capsules patches, ampoules) one discrete dose unit.  For undivided preparations (for example, liquids, powders) the normal amount administered as a single human therapeutic dose, or in the case of a Drug for animal use, a single adult therapeutic dose relevant to the animal being treated.
<b>Drugs of Dependence</b>	Means a poison declared by the Poisons Regulations to be a drug of dependence.  For the purposes of this Code drugs of dependence are referred to as S8 drugs.
<b>Electronic storage and supply unit (ESSU)</b>	A computerised device or cabinet used to store and supply or administer medicines, such as a robotic device in a warehouse, pharmacy, or hospital, an automated dispensing cabinet (ADC) or an anaesthetic workstation.  For the purposes of the Code, an ESSU is a safe.
<b>Hospital</b>	As defined in Section 3 of the <i>Health Care Act 2008</i> .
<b>Key</b>	Any means used to lock or unlock a drug storage cabinet, safe, or strongroom and includes a physical key, combination, personal identification number (PIN), password, electronic card, code or other device.
<b>MATOD</b>	Medication Assisted Treatment for Opioid Dependence.
<b>Medical practitioner</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .
<b>Midwife</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .
<b>Monitored</b>	Being observed by a person, or by a system which alerts a person in Australia, in real-time.
<b>Movement detector</b>	A device that detects movement, which when triggered, activates an alarm, alert or other warning or signal.
<b>Nurse</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .

<b>Nurse practitioner</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .
<b>Paramedic</b>	As defined in Schedule 2 Section 120A of the <i>Health Practitioner Regulation National Law (South Australia) Act 2010</i> .
<b>Personally supervised</b>	Physically present, near where the Drugs are being stored.
<b>Pharmacist</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .
<b>Registered health practitioner</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .
<b>S8 safe</b>	A lockable medicine store for S8 drugs or S8 waste.
<b>S8 waste</b>	A S8 drug in a form that— <ul style="list-style-type: none"> <li>• is leftover, or is an unwanted by-product, from a manufacturing process; or</li> <li>• is surplus or unwanted; or</li> <li>• is expired or otherwise unusable.</li> </ul>
<b>Securely attached to the premises</b>	<p>Attached to the building in such a way to inhibit removal:</p> <p>Attached to a concrete floor, a brick or concrete wall with expanding bolts of at least 8mm in diameter, or, for a plaster, timber, or other wall, through wooden or metal studs or noggins with coach screws of at least 8mm in diameter, that are fastened inside the safe. For a refrigerator, the bolts or screws may be fastened inside the refrigerator or inside the cabinet or similar in which the refrigerator is kept.</p> <p>If mounting on a concrete floor or a brick or concrete wall is not possible, the safe, or cabinet for a safe that is a refrigerator, must be securely mounted on structural elements of the building such as timber or metal studs or floor joists, or to a thick metal plate or other fixture that is secured to the wall or floor.</p> <p>If mounting is not feasible as the safe is mobile, the safe must be secured to the floor, wall, or ceiling with at least 4mm hardened steel chain attached to two sleeve anchors or similar fasteners of at least 10mm thick.</p>
<b>Uniform Poisons Standard</b>	As defined in Regulation 3 of the <i>Controlled Substances (Poisons) Regulations 2011</i> .
<b>Vault or Strongroom</b>	A secure storage unit capable of storing large volumes of drugs that a person can physically enter, other than a cupboard or storeroom.
<b>Veterinary surgeon</b>	As defined in Section 4 of the <i>Controlled Substances Act 1984</i> .

A term used in this Code that is defined in the Act or the Poisons Regulations, and is not referred to in this glossary, has the meaning stated in the Act or Poisons Regulations.

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