

**From:** Chris Hayes  
**To:** [medboardconsultation](#)  
**Cc:** [REDACTED]  
**Subject:** Public consultation on Good medical practice  
**Date:** Monday, 2 July 2018 3:41:36 PM

---

Dear consultation team,

Re Section 8 Patient safety and minimising risk

I suggest that this section might be enhanced by specific examples of what might constitute reasonable and unreasonable practice. I work in the specialty of pain medicine and regularly see examples of prescribing practice at odds with good medical practice. Specific recommendations about how to improve practice would be helpful - ranging from discussion with an experienced colleague through to regulatory approaches.

It is now clear from the literature that prescription of high dose opioids (> 100mg oral morphine equivalent daily dose) is associated with increased harms including death. The co-prescription of benzodiazepines with opioids further increases the risk of death. Despite the rising death rate some doctors continue to prescribe opioids and benzodiazepines in a way that is not supported by evidence.

I wonder if the revision of the GMP code of conduct might address the issue of prescription against current guidelines.

Chris Hayes

[REDACTED]

---