

Education and Training Committee, 1 March 2018

Approval and monitoring of independent and supplementary prescribing programmes.

1. Introduction

- 1.1 This paper discusses the approach taken to approve and monitor supplementary prescribing (SP) and independent prescribing (IP) programmes since the introduction of revised, dedicated standard to this area of practice in 2013¹.
- 1.2 The Executive recommends the current mandatory requirement that approved prescribing programmes seek further approval to admit additional professions which have been granted prescribing rights be removed. Our recent activities in this area indicate this requirement is not proportionate to the changes that programmes may need to make to ensure our standards are met.
- 1.3 In its place, the Committee are asked to consider whether prescribing programmes which are incorporating new professions into their provision should be treated in the same way as all other approved programmes. This would require education providers to notify us when significant changes are being made, and to engage with us via annual monitoring where changes can also be reviewed.

2. Current approach to approval and monitoring for prescribing programmes

- 2.1 Our existing approach requires ²education providers already delivering approved prescribing programmes to seek further approval from us whenever they intend to admit new professions to undertake prescribing training. The last professions to receive prescribing rights were therapeutic radiographers (IP) and dieticians (SP) in 2016.
- 2.2 This further approval process involves a documentary review of programme changes by visitors. The visitors then make recommendations to the Education and Training Committee (Panel) regarding how the programme continues to meet our standards. Importantly, this means it can take around three months before education providers are approved to start admitting

¹ <http://www.hcpc-uk.org/aboutregistration/standards/standardsforprescribing/>

² [Extension of prescribing rights and use of exemptions from medicines legislation, Education and Training Committee - March 2015](#)

additional professions onto their programmes. This approach also differs significantly to how all other programmes are approved and monitored.

- 2.3 Normally, we provide open ended approval to an education provider’s programme once they have successfully completed the approval process. Following approval, education providers are required to notify us where they deem they are making significant changes to the way their programme meets our standards. Education providers are also required to engage with our annual monitoring process, where changes can also be reviewed, alongside how the programme has been delivered over a two-year period. These monitoring processes can lead to another approval process being instigated, where it is proportionate and reasonable to do so.
- 2.4 Over time, we see this approach allows us to focus on risks to how programmes meet our standards in a proportionate way. Importantly, this approach also means education providers can adapt and change their programmes flexibly, and engage with us where they need to around the review of changes, without impacting unnecessarily on their ability to start new cohorts through approved programmes.

3. Changes education providers may need to make to incorporate additional professions

- 3.1 Prescribing programmes are based on a multi-professional model which is structured to support a number of regulated professions (nurses, pharmacists, chiropodists/podiatrists, radiographers, physiotherapists, dietitians) training together to achieve competency in this area of practice. Whilst most prescribing programmes we approve don’t deliver to the full range of professions, all do deliver prescribing to at least more than one.
- 3.2 Within this model the theory and practical aspects of the training are generic, with adjustments made to provide profession specific context where needed to meet our standards. These adjustments particularly relate to the following areas of our standards:

Programme area	Related prescribing standards
There must be an adequate number of appropriately qualified and experienced staff in place to deliver all aspects of the programme, including any specialist subject areas.	B.5, B.6
Within a multi-professional environment, the profession specific knowledge must be adequately identified and addressed.	C.9
Designated medical practitioners (DMP) must be suitably prepared and experienced to support effective supervision and learning.	D.6

3.3 To achieve this balance of generic and profession specific context within their programmes, education providers commonly undertake the following activities.

- Requiring assessed elements of reflection on clinical practice
- Including new professions where appropriate to do so in programme teaching and/or programme development
- Requiring designated medical practitioners to be appropriately experienced to support specific clinical areas of practice for each profession and registrant (learner)
- Including profession specific context to support understanding and application of pharmacology theory

3.4 As all approved programmes have already satisfied us that they can deliver a multi-professional programme through our initial approval process, we would expect education providers to apply the same considerations to incorporate additional professions. For some education providers, this may lead to further programme changes being made, which vary in significance to how our standards are met.

4. Outcomes from our last round of documentary review

4.1 Since legislation was passed in 2016, we have been working with education providers to enable therapeutic radiographers and dietitians to undertake training in prescribing. To date, 17 education providers have sought approval from us to admit these professions.

4.2 Table – Outcomes for 17 education providers seeking further approval to deliver therapeutic radiographer and/or dietitian prescribing training

Education providers who met standards through documentary review	16
Education providers who met standards following an approval visit	1
Standards met at first documentary review	7
Standards met after requiring additional documentation	9

4.3 The results indicate most education providers satisfied our visitors through the documentary review process. Although just over half required an additional documentary submission, in all cases, this was to satisfy visitor requests which:

- did not specifically relate to the inclusion of the new professions; or
- identified minor inconsistencies with programme documentation to support the additional professions; or
- required the education providers to clarify how the existing structures in place continued to be appropriate to support additional professions.

4.4 Although one education required an approval visit, no conditions were placed on their programme following its completion. In this case the education

provider was not making changes, however did not clearly articulate how the programme would continue to meet the standards through the documentary process.

4.5 These outcomes suggest some education providers are not making significant changes to continue meeting our standards when engaging with our mandatory review process. In addition, the current approach seems to discount the multiprofessional context within which programmes have already met our standards, requiring education providers to restate their approach each time a new profession is incorporated.

4.6 It also seems education providers were not clear around our requirements, and in some cases were confused as they felt they were not making significant changes which impacted on our standards.

5. Options for discussion

5.1 With paramedics earmarked to receive prescribing rights in 2018, we now need to consider the regulatory involvement needed to ensure future professions are suitably incorporated into approved programmes.

5.2 The Executive consider two options are available:

	Option	Impact
1	Continue to set a mandatory requirement that all approved prescribing programmes must notify us when they intend to incorporate additional professions	<ul style="list-style-type: none"> Requires no change in our approach to the review of approved prescribing programmes, however further work around communicating our requirements before any new professions are eligible to prescribe will be carried out. Education providers would need to seek further approval before they could commence with the additional professions on their programmes.
2	Allow education providers to admit new professions into their approved prescribing programmes once medicines legislation passes. We would also require any significant changes to programmes being made as a result to be notified to us as a major change.	<ul style="list-style-type: none"> Prescribing programmes will fall into line with how change across all other approved programmes is managed. Education providers will need to notify us if they are making significant changes as part of incorporating additional professions into their provision.

		<ul style="list-style-type: none"> • As with all other programmes, we will still annually monitor these programmes, through which changes could also be reviewed.
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6. Decision

6.1 The Committee is invited to discuss the two options set out in paragraph 5.2 of this paper and decide on the approach to quality assure the incorporation of additional professions into approved prescribing programmes.

Background information

- None

Resource implications

The resource implications of this paper include the following.

- Both options will require further communications activities to be carried out with education providers around our requirements.
- Option 2 will lead to a reduction in resources needed to review approved prescribing programmes through the documentary processes outlined in this paper.

Financial implications

The financial implications of this paper include the following.

- None

Appendices

- None

Date of paper

19 February 2017