

8 December 2020

## **Health and Care Professions Council response to NHS England's consultation on proposed amendments to the list of medicines that paramedics are able to administer under exemptions within the Human Medicines Regulations 2012 across the United Kingdom**

### **1. Introduction**

- 1.1 The Health and Care Professions Council (HCPC) welcomes the opportunity to respond to this consultation on the proposal to amend the list of controlled medicines that paramedics can administer under exemptions.
- 1.2 The HCPC is a statutory UK-wide regulator of healthcare and psychological professions governed by the Health Professions Order 2001. We regulate the members of 15 professions. We maintain a register of professionals, set standards for entry to our register, approve education and training programmes for registration and deal with concerns where a professional may not be fit to practise. Our main role is to protect the public.

### **2. Our responses**

- 2.1 We have provided responses to the consultation questions where relevant to our role as the professional regulator for orthoptists.

#### **Question 1: Should amendments to legislation be made to enable paramedics to administer additional specifically listed medicines to their patients using exemptions?**

- 2.2 We support the amendments set out in the consultation under proposal 2.
- 2.3 As a regulator, the HCPC's first priority is the safety of the public. As highlighted in the consultation document, the HCPC believes that amending the list of drugs that paramedics are able to administer under exemptions is a positive step for service users. By amending legislation and removing the barrier of complicated PGDs for the listed drugs, we believe that this proposal will allow for a standardisation of the medicines used by paramedics across the UK. This standardisation is likely to have positive impacts on patient wellbeing.
- 2.4 As the regulator of 15 different professions, we do not set or limit the particular tasks that registrants can perform. Instead we expect registrants to act within their scope of practise and to have received suitable training for all aspects of their role.

- 2.5 Our Standards of Proficiency (SOPs) for paramedics<sup>1</sup> already require the profession to have the skills, knowledge and experience to administer medicines through their pre-registration education and training. To gain entry to the register, paramedics must understand the physiological, pharmacological, structural, behavioural and functional changes in patient presentation as well as the theories supporting problem solving and clinical reasoning. In addition, they must understand relevant pharmacology and the administration of therapeutic medications, including pharmacodynamics and pharmacokinetics.
- 2.6 While paramedics must have the competencies discussed above in order to be registered with the HCPC, most paramedics are already competent to administer and supply the medicines proposed in this consultation and currently do so through PGDs.
- 2.7 We are supportive of this proposal which acknowledges the professional development of the paramedic profession and the role the profession plays in delivering integrated health and care.

**Question 2: Do you have any additional information on any aspects not already considered as to why the proposal to amend the list of medicines that paramedics are able to administer under exemptions SHOULD go forward?**

- 2.8 We agree with the rationale put forward in this consultation in support of amendments to legislation being made. We do not have any additional information to provide on any aspects that would either prevent or support this proposal going forward.

**Question 3: Do you have any additional information on any aspects not already considered as to why the proposal to amend the list of medicines that paramedics are able to administer under exemptions SHOULD NOT go forward?**

- 2.9 We agree with the rationale put forward in this consultation in support of amendments to legislation being made. We do not have any additional information to provide on any aspects that would either prevent or support this proposal going forward.

---

<sup>1</sup>Standards of proficiency for all our professions can be found on our website: <https://www.hcpc-uk.org/standards/standards-of-proficiency/paramedics/>

**Question 4: Please indicate to what extent you agree or disagree with each of the proposed medicines that paramedics would be able to administer to their patients under exemptions within the Human Medicines Regulations:**

	Strongly agree	Agree	Neither	Disagree	Strongly disagree
Lorazepam - controlled drug	X				
The ability for paramedics to supply lorazepam under exemptions is a positive step for the profession. Removing the barriers for ambulance trusts to complete PGDs, for this drug may result in a higher level of standardisation across the UK which we believe will have a positive impact on patient safety.					
Midazolam - controlled drug	X				
The ability for paramedics to supply midazolam under exemptions is a positive step for the profession. Removing the barriers for ambulance trusts to complete PGDs, for this drug may result in a higher level of standardisation across the UK which we believe will have a positive impact on patient safety.					
Dexamethasone - steroid	X				
The ability for paramedics to supply dexamethasone under exemptions is a positive step for the profession. Removing the barriers for ambulance trusts to complete PGDs, for this drug may result in a higher level of standardisation across the UK which we believe will have a positive impact on patient safety.					
Magnesium sulfate - mineral	X				
The ability for paramedics to supply magnesium sulfate under exemptions is a positive step for the profession. Removing the barriers for ambulance trusts to complete PGDs, for this drug may result in a higher level of standardisation across the UK which we believe will have a positive impact on patient safety.					
Tranexamic acid - antifibrinolytic	X				
The ability for paramedics to supply tranexamic acid under exemptions is a positive step for the profession. Removing the barriers for ambulance trusts to complete PGDs, for this drug may result in a higher level of standardisation across the UK which we believe will have a positive impact on patient safety.					
Flumazenil – reversal of	x				

benzodiazepine over-sedation					
The ability for paramedics to supply Flumazenil under exemptions is a positive step for the profession. Removing the barriers for ambulance trusts to complete PGDs, for this drug may result in a higher level of standardisation across the UK which we believe will have a positive impact on patient safety.					

**Question 5: Does the 'Consultation Stage Impact Assessment' give a realistic indication of the likely costs, benefits and risks of the proposal? Please select the options that best apply.**

	Yes	No	Don't know
Costs			X
Benefits	X		
Risks	X		

2.10 We do not have any specific comments about the cost assumptions or estimates made in the Consultation Stage Impact Assessment. The HCPC does not have specific comments about the cost benefits set out in the Impact Assessment.

2.11 We believe that the benefits set out for the paramedic profession and for patients are realistic.

2.12 We believe that the minimal risks set out as well as the steps required to mitigate those risks are realistic.

**Question 6: Do you think that this proposal could impact (positively or negatively) on any of the protected characteristics covered by the Public Sector Equality Duty set out in section 149 of the Equality Act 2010 or by section 75(1) of the Northern Ireland Act 1998?**

2.13 No.

2.14 We believe that other stakeholders would be better placed to respond to this question. However, we do not consider that amendments to the list of medicines paramedics can provide under exemptions should have adverse effects on any specific group.

**Question 7: Do you feel that this proposal could impact (positively or negatively) on health inequalities experienced by certain groups?**

2.15 No.

2.16 We believe that other stakeholders would be better placed to respond to this question. However, we do not consider that amendments to the list of medicines paramedics can provide under exemptions should have adverse effects on any specific group.