



Council of Deans of Health Response to NHS England consultation on proposals to introduce independent prescribing by paramedics across the United Kingdom

12 May 2015

The Council of Deans of Health

The Council of Deans of Health (CoDH) is the representative voice of all 85 UK university health faculties engaged in education and research for nursing, midwifery and the allied health professions. Further information about us can be found on our website: <http://www.councilofdeans.org.uk/>. We welcome the opportunity to respond to this consultation.

Consultation questions

Q1. Should amendments to legislation be made to enable paramedics to prescribe independently?

Yes.

The evidence from other professions where independent prescribing has been introduced is that it facilitates patients' timely access to appropriate medicines, particularly compared to relatively inflexible mechanisms such as patient group directives (PGDs) and patient specific directions (PSD). Paramedics are a vital part of moves across the UK to provide urgent care for patients as close to home as possible. Appropriate prescribing responsibilities are a core part of being able to achieve the aspiration to have paramedics who are able to 'see and treat' patients at the scene, delivering timely and effective care and helping to reduce unnecessary admissions to hospital and pressure on A&E. Prescribing responsibilities would also enable paramedics to take on new roles in primary care, giving more patients access to care and treatment close to home.

Q2. Which is your preferred option for the introduction of independent prescribing by paramedics?

We support Option 2 (independent prescribing for any condition from a full formulary).



A restricted formulary or list of conditions would reduce the flexibility for paramedics to respond to patients' needs (2/3 of which would be urgent care), reducing the potential benefit to patient outcomes of paramedic prescribing.

Q3. Do you agree that paramedics should be able to prescribe independently from the proposed list of controlled drugs?

Yes. We support the College of Paramedics' rationale that these drugs are a required part of delivering effective and timely care to patients, for example in order to relieve pain in palliative and end of life care.

Q4. Should amendments to medicines legislation be made to allow paramedics who are independent prescribers to mix medicines prior to administration and direct others to mix?

Yes. We support the inclusion of medicines mixing in paramedic independent prescribing, in line with independent prescribing in other professions.

Q5. Do you have any additional information on any aspects not already considered as to why the proposal for independent prescribing SHOULD go forward?

No.

Q6. Do you have any additional information on any aspects not already considered as to why the proposal for independent prescribing SHOULD NOT go forward?

No.

Q7. Does the 'Consultation Stage Impact Assessment' give a realistic indication of the likely costs, benefits and risks of the proposal?

The impact assessment is clear and covers a wide range of material. The impact assessment considers the current capacity of the university sector to provide the education to qualify as an independent prescriber and the entry requirements that apply. However, we believe that the impact assessment should highlight a risk relating to the wide variation in level of initial paramedic education. Current pre-registration education varies from a protocol-based training programme at CertHE level (Level 4/7) to a three



year BSc programme (Level 6/9/10). In Northern Ireland, all education is currently delivered at Level 4/7. Although there are substantial efforts underway to raise the educational threshold and reduce variation, these differences in underpinning knowledge and critical thinking could prove challenging for the delivery of independent prescribing education.

Q8. Do you have any comments on the proposed practice guidance for paramedic prescribers?

The guidance is comprehensive and clear.

Q9. Do you have any comments on the 'Draft Outline Curriculum Framework for Education Programmes to Prepare Paramedics as Independent Prescribers'?

No.

Q10. Do you have any comments on how this proposal may impact either positively or negatively on specific equality characteristics, particularly concerning: disability, ethnicity, gender, sexual orientation, age, religion or belief, and human rights?

In essence, this proposal should facilitate timely access to appropriate treatment. It should therefore provide positive benefits to any patient group typically disadvantaged by inequities focused on access to healthcare, whether from disability, ethnicity or age.

Q11. Do you have any comments on how this proposal may impact either positively or negatively on any specific groups, e.g. students, travellers, immigrants, children, offenders?

We have no further comments on this.

Contact for further information:

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