

NMC programme of change for education

Prescribing and standards for medicines management

This response form relates to our consultation on nurse and midwifery prescribing competency proposals, programme requirements for nurse and midwife prescribers and standards for medicines management.

Note: If you want to respond to our parallel consultation relating to our nurse proficiencies and education framework, you can download the response form from our main consultation web pages at:

<https://www.nmc.org.uk/globalassets/sitedocuments/edcons/cq1-nurse-proficiencies-and-education-framework-consultation-response-form.doc>

Information and supporting links to this consultation is available on our website and everyone is welcome and encouraged to respond to all areas of the consultation. We recognise however that some respondents will want to respond to specific consultation questions in certain areas of our standards. Therefore the questions will be introduced and arranged in a way that introduces each of the specific standard subject areas we are consulting on and will signpost and will provide ease of navigation to specific individual areas that we are consulting on that may be of specific interest to them. To enable respondents to answer, reference to the supporting information will be embedded into certain questions to provide additional information about the standards. We will encourage individuals and organisations to respond electronically to the independent research company, Why Research Ltd. who are collecting all the responses and will be undertaking the independent analysis on our behalf. Opportunities to save responses before submitting electronically will be available. Alternative approaches for responding to Why Research Ltd. will also be available if an alternative approach for your consultation is needed.

Consultation questions have been arranged under the following categories:

- [Draft nurse and midwife prescribing competency](#)
- [Draft nurse and midwife prescribing programme requirements](#)
- [Standards for medicines management](#)
- [Equality and diversity and inclusion questions – ‘About you’](#)
- [Programme of change for education – impact assessment](#)

After you have filled in this response form

Once you have completed the questions relating to the above topics you are interested in, please either copy and paste your responses into the NMC online consultation survey at:

https://www.surveymonkey.com/r/WHYRESEARCH_NMC_Consultation

or email your completed form to:

whyconsultations@whyresearch.co.uk

Draft nurse and midwife prescribing competency

There is some cross over between the questions we are asking about our proposals in relation to prescribing proficiencies, and the questions we are asking in relation to our proposed prescribing education and training requirements. We therefore recommend that you view these questions together with the prescribing programme requirements questions contained within our education framework consultation document.

Q.PC.1. Do you agree with our proposal to use the Royal Pharmaceutical Society's *Single competency framework for all prescribers* as the basis for our nurse and midwife prescribing proficiencies and within our post-registration prescribing programme requirements?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

Q.PC.2. If you answered strongly agree or agree to the question above, do you think this will promote a shared approach to prescribing competency between professional groups?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

Q.PC.3. Increasingly care is taking place closer to home. In order to support the needs of people through new models of care it is important to increase nurse and midwife access to prescribing support, supervision and assessment.

Do you agree with our proposal to remove the designated medical practitioner role and title and replace this with a prescribing practice supervisor and assessor roles? This could be any registered healthcare professional with a suitable prescribing qualification and relevant prescribing experience.

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

Q.PC.4. During pre-consultation engagement potential risk areas of prescribing practice were highlighted, for example remote prescribing, cosmetic prescribing and independent prescribing practice.

Do you agree that additional guidance in such areas of prescribing practice should be developed in line with the Code¹ to ensure the public who seek access to these areas of prescribing practice are protected?

<input checked="" type="checkbox"/> Strongly agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
--	--------------------------------	---	-----------------------------------	--	-------------------------------------

¹ The Code: Professional standards of practice and behaviour for nurses and midwives (2015)



Draft nurse and midwife prescribing programme requirements

There is some cross over between the questions we are asking in relation to our proposed prescribing education and training requirements, and the questions we are asking regarding our proposals in relation to prescribing proficiencies. We therefore recommend that you view these questions in conjunction with our prescribing consultation document.

Q.PPR.5. Currently a nurse or midwife has to be registered for two years before being eligible to undertake a community nurse prescribing programme known as V150.

We are proposing that immediately after successful completion of their pre-registration nursing programme and following registration, a registered nurse or midwife can complete the practice requirements of a community practitioner prescribing programme (known as V150).

Do you agree with this approach?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

We agree with this. It is important that the NMC communicates clearly that on registration newly qualified nurses will not be able to prescribe and will have to successfully complete a prescribing programme, which they will be able to commence at an earlier stage in their career.

Q.PPR.6. We are consulting on the introduction of teaching and learning of prescribing theory into pre-registration nursing degree programmes. This means that newly qualified nurses in the future will be ready to commence a V150 prescribing programme following initial registration as long as they have the necessary support in place.

This is intended to support proficiency of prescribing practice across a range of settings at an earlier stage of a nurse's career.

Do you agree with this approach?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

We support this approach in principle. As the length of pre-registration programmes in England, Wales and Northern Ireland are not expected to increase there is concern among AEIs about including another element into an already busy pre-registration curricula.

The introduction of prescribing theory into pre-registration will require workforce developments to ensure educators and mentors have the required skills to teach and champion safe and effective prescribing.

Q.PPR.7. The needs of people are changing and new models of care are emerging. Nurses in the future will demonstrate evidence of enhanced theoretical knowledge that supports earlier progression towards prescribing practice.

We are proposing that registrants complete one year post-registration practice (currently three years) in order to be eligible to commence a supplementary / independent prescriber (known as V300) programme. Do you agree with this approach?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

Q.PPR.8. Requirement 4.6.1 states that a pharmacology exam must be passed with a score of a minimum score of 80%. Do you agree:

<input type="checkbox"/> that the minimum score is 80%?	<input checked="" type="checkbox"/> that the minimum score should be higher than 80%?	<input type="checkbox"/> that the minimum score should be lower than 80%	<input type="checkbox"/> Don't know
---	---	--	-------------------------------------

We agree with this. Poor knowledge will compromise patient safety.

Q.PPR.9. Requirement 4.6.2 states that the numeracy assessment needs to be passed with a score of 100%. Do you agree with the pass score being 100%?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

Q.PPR9a. If you answered strongly disagree or disagree do you believe that the pass mark should be set within a flexible range instead and what do you think that range should be?

Standards for medicines management

Q.SMM.10. Governance and policy decisions about safe management of medicines should be made by organisations who deliver care and services to people and patients? Do you agree?

<input type="checkbox"/> Strongly agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
---	---	---	-----------------------------------	--	-------------------------------------

Q.SMM.11. Evidence based practice, policies and standards of management of medicines should apply to all health care professionals rather than having separate standards (set by us) that only apply to nurses and midwives. Do you agree?

<input checked="" type="checkbox"/> Strongly agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neither agree nor disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Don't know
--	--------------------------------	---	-----------------------------------	--	-------------------------------------

Q.SMM.12. How often do you use the current Standards for Medicines Management?

<input type="checkbox"/> Very often	<input type="checkbox"/> Often	<input type="checkbox"/> Infrequently	<input type="checkbox"/> Rarely	<input type="checkbox"/> Not at all	<input type="checkbox"/> Don't know
-------------------------------------	--------------------------------	---------------------------------------	---------------------------------	-------------------------------------	-------------------------------------

Q.SMM.12a. If you do use the Standards for Medicines Management standards, what do you use them for?

Q.SMM.12b. Are there certain aspects of our current Standards for Medicines Management that you use more than others?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Don't know
------------------------------	-----------------------------	-------------------------------------

Q.SMM.12c. If yes, please state which aspects are the most valuable to you.

Q.SMM.13. Do you agree with our proposals to withdraw our Standards for Medicines Management?

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Don't know

Q.SMM.14. If you strongly disagree or disagree with our proposals to withdraw our Standards for Medicines Management, what aspect of medicines management guidance for nurses and midwives would enhance public safety and public protection?

Q.SMM.15. What do you perceive to be the risks of withdrawal of our Standards for Medicines Management?

JD Risk to public, inconsistency of practice across UK???

Programme of change for education – equality and diversity and inclusion questions – ‘About you’

Q1. Are you responding as an individual or on behalf of an organisation? (please tick only one box)

- | | |
|--|--|
| <input type="checkbox"/> As an individual.
If yes go to Q2 | <input checked="" type="checkbox"/> On behalf of an organisation.
If yes go to Q14 |
|--|--|

Responding as an individual

Q2. Which of the following best describes you? (please tick only one box)

- | | | | |
|--|--|--|--|
| <input type="checkbox"/> I am a member of the public. If yes go to Q6 | <input type="checkbox"/> I am a nurse or a midwife. If yes go to Q3 | <input type="checkbox"/> I am a student nurse or a student midwife. If yes go to Q5 | <input type="checkbox"/> Other healthcare professional. If yes go to Q6 |
|--|--|--|--|

Nurses and midwives only

Q3. Which of the following categories best describes your current practice?

(Tick one or more areas that best describe the area you practise in)

- | |
|---|
| <input type="checkbox"/> Direct patient care |
| <input type="checkbox"/> Management |
| <input type="checkbox"/> Education Policy |
| <input type="checkbox"/> Research |
| <input checked="" type="checkbox"/> Other (Membership organisation) |

Q4. Please tick the box(es) which best describes the type of organisation you work for: (please tick all that apply)

- | |
|---|
| <input type="checkbox"/> Government department or public body |
| <input type="checkbox"/> Regulatory body |
| <input type="checkbox"/> Professional organisation or trade union |
| <input type="checkbox"/> NHS employer of doctors, nurses or midwives |
| <input type="checkbox"/> Independent sector employer of nurses and midwives |

- Agency for nurses or midwives
- Education provider
- Consumer or patient organisation
- Other (please give details here)

Q5. Please tick the box(es) below that most closely reflect(s) your role?

- Adult nurse
- Mental health nurse
- Learning disabilities nurse
- Children's nurse
- Specialist community public health nurse
- Health visitor
- Occupational health nurse
- School nurse
- Family health nurse
- Specialist practice nurse
- District nurse
- General practice nurse
- Midwife
- Student nurse
- Student midwife
- Other (please give details here)

All individuals

To help make sure that our consultations reflect the views of the diverse UK population, we aim to monitor the types of responses we receive to each consultation and over a series of consultations. Although we will use this information in the analysis of the consultation response, it will not be linked to your response in the reporting process.

Q6. What is your country of residence? (please tick only one box)

- England
- Northern Ireland
- Scotland
- Wales
- Other – European Economic Area
- Other – rest of the world (please say where)

Q7. What is your age (years)? (please tick only one box)

- Under 25
- 25–34
- 35–44
- 45–54
- 55–64
- 65 or over
- Prefer not to say

Q8. Are you: (please tick only one box)

- Female
- Male
- Prefer not to say

Q9. Please select one option to indicate whether your gender identity completely matches the sex you were registered at birth: (please tick only one box)

- Yes
- No
- Prefer not to say

Q10. Please indicate your sexual orientation (please tick only one box)

- Bisexual
- Gay man
- Gay woman or lesbian
- Heterosexual or straight
- Prefer not to say

Q11. What is your ethnic origin? (please tick only one box)

White

- British, English, Northern Irish, Scottish or Welsh
- Irish
- Gypsy or Irish traveller
- Any other white background (please specify here)

Mixed or multiple ethnic groups

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed or multiple ethnic group (please specify here)

Asian or Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background (please specify here)

Black, African, Caribbean or black British

- Caribbean

- African
- Any other black, African, or Caribbean background (please specify here)

Other ethnic group

- Arab
- Any other ethnic group (please specify here)
- Prefer not to say

Q12. Would you describe yourself as having a disability*? (please tick only one box)

*Disability in this context means a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.

- Yes
- No
- Prefer not to say

Q13. Please indicate your religion (please tick only one box)

- No religion
- Buddhist
- Christian
- Hindu
- Jewish
- Muslim
- Sikh
- Any other religion: (please specify here)
- Prefer not to say

Responding as an organisation

Q14. Which one of the following categories best describes your organisation? (please tick only one box)

- Government department or public body
- Regulatory body
- Professional organisation or trade union
- NHS employer of doctors, nurses or midwives
- Independent sector employer of nurses and midwives
- Agency for nurses or midwives
- Education provider
- Consumer or patient organisation
- Other (The Council of Deans of Health represents the UK's university faculties engaged in higher education and research for nurses, midwives and allied health professionals)

Q15. Does your organisation represent the views of nurses or midwives and/or the public that share the following characteristics? (select all that apply)

- Older
- Younger
- Disabled
- Ethnic groups
- Women / men
- Lesbian, gay and bisexual
- Transgender
- Pregnancy / maternity

Q16. In which country is your organisation based? (please tick only one box)

- UK wide
- England
- Scotland
- Northern Ireland
- Wales
- Other – European Economic Area
- Other – rest of the world (please say where)

Q17. Please give the name of your organisation: (Council of Deans of Health)

Q18. Would you be happy for your comments in this consultation to be identified and attributed to your organisation in the reporting, or would you prefer that your response remains anonymous? (please tick only one box)

- Happy for comments to be attributed to my organisation
- Please keep my responses anonymous

Q19. Please state your name: (Rachel Craine)

Q20. Please state your job title: (Senior Policy Officer)

Programme of change for education – impact assessment

The proposed prescribing requirements and withdrawal of our standards for medicines management should not create unlawful barriers or create disadvantage for diverse groups on the basis of: race, gender, disability, religion and belief, sexual orientation, age, gender reassignment, pregnancy/maternity, political belief or being in a marriage/civil-partnership.

Will any of our proposals have a particular impact on these groups across the following categories?

EDI.1a. Race:

<input type="checkbox"/> Yes – largely positive impact anticipated	<input type="checkbox"/> Yes – largely negative impact anticipated	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Don't know
--	--	--	-------------------------------------

Provide any comments here

EDI.1b. Gender:

<input type="checkbox"/> Yes – largely positive impact anticipated	<input type="checkbox"/> Yes – largely negative impact anticipated	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Don't know
--	--	--	-------------------------------------

Provide any comments here

EDI.1c. Disability:

<input type="checkbox"/> Yes – largely positive impact anticipated	<input type="checkbox"/> Yes – largely negative impact anticipated	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Don't know
--	--	--	-------------------------------------

Provide any comments here

EDI.1d. Religion and belief:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

EDI.1e. Sexuality orientation:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

EDI.1f. Age:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

EDI.1g. Gender reassignment:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

EDI.1h. Pregnancy / maternity:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

EDI.1i. Political belief:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

EDI.1j. Being in a marriage or civil partnership:

Yes – largely positive impact anticipated Yes – largely negative impact anticipated No Don't know

Provide any comments here

This completes your responses.

Thank you very much for taking the time to participate in the NMC programme of change for education: prescribing and standards for medicines management consultation.

After you have filled in this response form

Once you have completed this form, please either copy and paste your responses into the NMC online consultation survey at:

<https://www.surveymonkey.com/r/ED1j>

or email your completed form to:

whyconsultations@whyresearch.co.uk