



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

24 April 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 read at: <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 dietitians to supplementary prescribe?

We strongly support the proposal to allow dietitians to supplementary prescribe. The prescription of medicines is the most common intervention that patients receive for the management of medical conditions; there are more than four million prescriptions a year in England alone.

The UK is a world leader in progressive policy and practice for non-medical prescribing, underpinned by robust research focused on patient safety. Non-medical prescribing has already had a major positive impact on the quality and efficiency of healthcare, particularly in enabling faster access to prescribed medicines. In this context, the current project to change prescribing legislation for four of the allied health professions promises significant additional patient benefit.

The other advantages that this change would bring are:

- Making better use of dietitians' skills in delivering effective and timely patient centred care. This change would build on the high level of pharmaceutical knowledge dietitians already have.



- Make it easier for patients to access appropriate treatment and medicines at an earlier stage, reducing the need for costly GP or hospital appointments solely to obtain a prescription.
- Single point of contact for patients, promoting continuity of care.
- Consistent with policy initiatives to bring services closer together and improve health outcomes for all.

Q2. Do you have any additional information as to why the proposal for supplementary prescribing by dietitians SHOULD go forward?

We have no further comments on this.

Q3. Do you have any additional information as to why the proposal for supplementary prescribing by dietitians SHOULD NOT go forward?

We have no specific comments on this.

Q4. Does the 'Consultation Stage Impact Assessment' give a realistic indication of the likely costs, benefits and risks of the proposal?

Yes, the impact assessment is clear and comprehensive.

Q5. Do you have any comments on the proposed practice guidance for dietetic supplementary prescribers?

The guidance is comprehensive and a helpful resource for dietetic supplementary prescribers. We have no further comments.

Q6. Do you have any comments on the 'Draft Outline Curriculum Framework for Education Programmes to Prepare Dietitians as Supplementary Prescribers'?

Prescribers must have sufficient education, training and competence to be able to prescribe safely and confidently. In line with other AHP prescribers, dietitians' ability to supplementary prescribe will depend on them successfully completing a post-registration education programme and meeting the HCPC standards. Our members have a pivotal role in designing programmes within the outline curriculum framework. We generally agree that the draft outline curriculum framework is flexible enough to enable HEIs to develop programmes that will develop the knowledge and skills required by dietitian



supplementary prescribers and to meet the HCPC standards for post-registration programmes.

Q7. 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?

The impact of supplementary prescribing by dietitians should be beneficial to a wide population by making it easier for patients to access appropriate treatment and medicines. In line with other AHP supplementary prescribers, dietitians will practise in line with approved guidelines and taking account of patient's need and best interest. Communication across all group of people and working effectively in teams with other health and social care professionals, in a vital part to ensuring the success of this transition.

Q8. 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:

Rachel Craine, Senior Policy Officer

Rachel.Craine@cod-health.ac.uk