



Health and Care Professions Council: Consultation on revised Standards for prescribing

Council of Deans of Health written submission – December 2018

The Council of Deans of Health welcomes the opportunity to contribute to this consultation. The Council represents the 84 UK university faculties engaged in education and research for nursing, midwifery and the allied health professions.

Consultation response

Questions about the standards for education providers

1. Do you agree that the draft revised standards for education providers are set at the level necessary to ensure all learners are able to prescribe safely and effectively by completion of a HCPC-approved programme?

Strongly Agree. The Council believes that these are set at the appropriate level.

2. Do you agree that the role of practice educator should be extended to all qualified, registered (and where relevant, annotated) prescribers with the relevant skills, knowledge and experience to support safe and effective learning?

Agree. However, it would be advisable to add a minimum number of prescriptions to be undertaken by a practice educator. This should be added to afford an additional protection to the educational experience of students.

3. Do you agree that adopting the Royal Pharmaceutical Society's 'A Competency Framework for All Prescribers' as the HCPC's standards for all prescribers would sufficiently deliver education and training outcomes for interprofessional learning?

Strongly Agree. This is a progressive regulatory development. The framework is clear, coherent, and applied. The framework's expectations around contextualisation permit appropriate flexibility to apply to a range of prescribers. Interprofessional learning is evident within the competencies.

4. Do you agree that adopting the Royal Pharmaceutical Society's 'A Competency Framework for All Prescribers' as the HCPC's standards for all prescribers would sufficiently deliver education and training outcomes for profession-specific learning?

Strongly Agree. Profession specific learning is evident within the competencies.

5. Do you think that any additional standards or guidance specific to education and training in prescribing are needed?

No. The standards are sufficient in their current form.

Questions about the standards for all prescribers

6. Do you agree with our proposal to adopt the Royal Pharmaceutical Society's 'A Competency Framework for All Prescribers' as the HCPC's standards for all prescribers?

Strongly Agree.

7. If the HCPC were to adopt the Royal Pharmaceutical Society's 'A Competency Framework for All Prescribers', do you think that any additional standards or guidance specific to prescribing practice are needed?

No. Their current use suggests fitness for purpose in their current form.

8. We would like to implement revised standards for prescribing (both standards for education providers and standards for all prescribers) for the 2019/2020 academic year. Do you agree that this it is reasonable to implement revised standards for prescribing by September 2019?

Institutional flexibility should be allowed for. This may generate a significant workload and there may be a case for a longer implementation for some institutions.

9. Do you think that as proposed, the revised standards for prescribing would suitably support safe and effective prescribing by HCPC registrant groups who may gain the opportunity to train in prescribing in the future?

Yes.

10. Do you think that any aspects of our proposals could have equality, diversity or inclusion implications for groups or individuals with protected characteristics? If yes, please suggest how you think this should be addressed.

No.

11. Do you have any other comments about our proposals?

The Council welcomes the move to create greater consistency of prescribing standards between regulators through adopting the Royal Pharmaceutical Society's 'A Competency Framework for all Prescribers.' It is hoped that this will allow for an increase in the number of prescribers while still assuring public protection.

For more information contact:

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