

Council, 7 July 2011

Ownership of the outline curriculum framework for independent and supplementary prescribing

Executive summary and recommendations

Introduction

Chiropodists/podiatrists, physiotherapists and radiographers can all currently complete post-registration training to become supplementary prescribers. The Department of Health is currently undertaking a project to extend independent prescribing rights to chiropodists/podiatrists and physiotherapists.

Part of the project group's remit is to develop the necessary governance arrangements to support safe and effective independent prescribing, including developing an outline curriculum framework for independent and supplementary prescribing. The Department of Health has asked whether we would own the outline curriculum framework which the project board is developing.

The request was considered by the Education and Training Committee at its meetings in March and June 2011. The Committee asked the Executive to seek the views of professional bodies on whether we should agree to own the framework to help the Committee to make their decision.

The Council is asked to discuss and agree the Committee's recommendation that we should not own the outline curriculum framework for independent and supplementary prescribing.

Decision

The Council is invited to:

- discuss and agree the recommendation made by the Education and Training Committee that the HPC should not own the outline curriculum framework;
- give reasons for that decision; and
- instruct the Executive to write to the Department of Health with the Council's response.

Background information

The Council has not previously considered any papers on this topic. The most recent paper considered by the Education and Training Committee can be found here:

www.hpc-uk.org/assets/documents/1000353F20110609ETC07-curricframework-suppresc.pdf

Resource implications

At this stage, there are no resource implications associated with the recommendation. However, there would be resource implications in the future if the decision was taken to own the curriculum framework. This would include resources to manage the curriculum framework and review it on a regular basis (for example, every five years).

Financial implications

At this stage, there are no financial implications associated with the decision as the Council. However, there would be financial implications in the future if the decision was taken to own the curriculum framework. This would be the costs associated with owning the framework, such as the costs of undertaking a public consultation on any changes to the framework.

Appendices

None

Date of paper

27 June 2011

Ownership of the outline curriculum framework for independent and supplementary prescribing

1. Introduction

- 1.1 The Department of Health is currently undertaking a project to extend independent prescribing rights to chiropodists/podiatrists and physiotherapists.
- 1.2 Part of the project to extend independent prescribing rights includes updating and revising the existing outline curriculum framework for supplementary prescribing, which is currently owned by the Department of Health. The Department has written to ask whether we would be willing to own the outline curriculum for independent and supplementary prescribing by allied health professionals.
- 1.3 This request was considered by the Education and Training Committee at its meetings in March and June 2011. The Committee asked the Executive to seek the views of professional bodies on whether we should own the outline curriculum framework before making a final recommendation to Council.
- 1.4 At its meeting in June the Committee recommended that we should not take ownership of the outline curriculum framework as the Committee believed it was not our role to own the curriculum.
- 1.5 This paper is divided into four sections:
 - section one provides an introduction to the paper;
 - section two outlines how other regulators approach ownership of curriculum frameworks for independent and supplementary prescribing;
 - section three outlines the responses we received from the professional bodies about ownership of the outline curriculum framework; and
 - section four provides points for the Council to discuss.

Supplementary prescribing and independent prescribing

- 1.6 At present, chiropodists/podiatrists, physiotherapists and radiographers can become supplementary prescribers, if they complete the appropriate training and have their entry on the Register annotated.
- 1.7 Supplementary prescribing is a voluntary prescribing partnership between the independent prescriber (doctor or dentist) and supplementary prescriber, to implement an agreed patient-specific clinical management plan (CMP), with the patient's agreement.¹
- 1.8 Following agreement of the CMP, the supplementary prescriber may prescribe any medicine for the patient that is referred to in the plan, until the next review by the independent prescriber. There is no formulary for supplementary prescribing, and no restrictions on the medical conditions that can be managed under these arrangements. However, the

¹ Department of Health, 'Medicines Matters' July 2006

supplementary prescriber cannot prescribe a medicine which is not referred to in the plan.

- 1.9 Independent prescribing is prescribing by a practitioner (such as a doctor, dentist, or nurse) responsible and accountable for the assessment of patients with undiagnosed or diagnosed conditions and for decisions about the clinical management, including prescribing.²
- 1.10 Independent prescribers can prescribe any medicine for any medical condition within their competence, including some controlled drugs for specified medical conditions. They must also comply with any relevant medicines legislation.
- 1.11 Supplementary prescribers can only prescribe a medicine where it is referred to in the CMP. By contrast, independent prescribers have autonomy and can prescribe any medicine within their competence and knowledge.

AHP medicines project board

- 1.12 The Department of Health has established a project board to introduce independent prescribing rights for physiotherapists and chiropodists/podiatrists, in line with the recommendations from the allied health professions (AHP) prescribing and medicines supply mechanisms scoping project.³ A member of the Executive is on the project board.
- 1.13 The project board has recently closed an informal engagement exercise seeking views on proposals to introduce independent prescribing. They have now received ministerial agreement to prepare a formal consultation document, but will need ministerial approval before undertaking that consultation.
- 1.14 Any decision to implement a change in prescribing rights would be subject to government agreement and would require an amendment to legislation. An amendment to legislation requires time and resources to implement and as such may be subject to delay or alteration.
- 1.15 Two working groups, one in education and one in governance, have been set up to support the work of the project board. The work streams are designed to allow joint working across the key stakeholders on important issues around ensuring safe and effective prescribing.
- 1.16 The role of the Education workgroup is to develop the necessary information to support the delivery of effective training in independent prescribing. This includes revising the outline curriculum framework for supplementary prescribing to include a curriculum framework for independent prescribing as well.

² Department of Health website
www.dh.gov.uk/en/Healthcare/Medicinespharmacyandindustry/TheNon-MedicalPrescribingProgramme/Background/index.htm

³ Allied health professions prescribing and medicines supply mechanisms scoping project report
www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_103949.pdf

- 1.17 The project board has contacted us to see whether we would agree to own the outline curriculum framework for education programmes to prepare allied health professionals as independent and supplementary prescribers.

Standards for supplementary and independent prescribing

- 1.18 As outlined in paragraph 1.6, three of the professions we regulate can currently act as supplementary prescribers, subject to completing the appropriate training and annotation of their entry on the Register.
- 1.19 We currently set a standard of proficiency for our registrants who undertake supplementary prescribing. The standard is incorporated within the standards of proficiency for the relevant profession and says:
- ‘know and be able to apply the key concepts which are relevant to safe and effective practice as a supplementary prescriber’
- 1.20 In addition to meeting this standard, supplementary prescribers would also have to meet the other standards of proficiency relevant for their scope of practice, as well as the standards of conduct, performance and ethics and standards for continuing professional development.
- 1.21 The standard of proficiency related to supplementary prescribing currently sits within the pre-registration standards for the particular profession. This is anomalous as the standard for supplementary prescribers can only be met by individuals who have completed their pre-registration training and are now registered with us. This standard is not therefore a pre-registration standard.
- 1.22 The Education and Training Committee have agreed in principle to set new and more detailed standards for independent and supplementary prescribing. It was agreed that these standards would incorporate both the standards of education and training relevant to the programme and the equivalents of standards of proficiency for prescribing. These standards would be published separately from the pre-registration standards of proficiency.
- 1.23 Setting standards in this way will help to ensure safe and effective prescribing practice. We will approve programmes against these standards. Part of the process of approval will include making sure that the programme’s learning outcomes meet the standards we have set.
- 1.24 This means that even if we do not decide to own the curriculum framework for independent and supplementary prescribing, we can still ensure that individuals completing the programme can demonstrate that they meet the standards that we have set.

Curriculum frameworks

- 1.25 We do not currently own curriculum frameworks for any of the professions that we regulate, nor do we set detailed curricula. This means that we are not currently involved in setting detailed requirements or expectations for

the number of hours of theory or practice, or the number or length of placements.

- 1.26 Many of the professional bodies for the professions we currently regulate are actively involved in developing and publishing curriculum guidance or frameworks for their professions. These documents often include detailed expectations around the structure of programmes, including the matters referred to above. In this way, the curriculum is owned by the profession rather than by the regulator. As we do not directly set a curriculum, this also provides some flexibility for education and training providers in designing their programmes.
- 1.27 Although we do not set a curriculum, education providers must meet several standards that we set in relation to the curriculum on a particular programme that we are approving. These are set out in the standards of education and training, SET 4.⁴
- 1.28 SET 4 contains broad standards which allow an education provider to design their programme in a way that takes account of all relevant curriculum frameworks. Standard 4.2 says that the programme must ‘...reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance’.
- 1.29 Education providers must show how the programme that they have designed reflects the relevant curriculum guidance. If the provider does not reflect relevant curriculum guidance, then they must show how they make sure that those who complete the programme are safe and effective practitioners.

The outline curriculum framework and approval of supplementary prescribing programmes

- 1.30 Registrants can only act as supplementary prescribers if they are from the relevant profession, have successfully completed an approved programme and have had their entry on the Register annotated as a supplementary prescriber.
- 1.31 The outline curriculum framework for supplementary prescribing is currently available on the Department of Health website although no organisation is identified for taking ownership of the framework.⁵ The framework has not been updated or amended since 2004, when it was published.
- 1.32 We approve post-registration qualifications in supplementary prescribing against the standards that we set. Programmes are assessed against all the standards of education and training (apart from SET 1: level of qualification for entry to the Register), including standard 4.2 (see paragraph 1.28).

⁴ Standards of education and training, <http://www.hpc-uk.org/aboutregistration/standards/sets/>

⁵ Outline curriculum for training programmes to prepare Allied Health Professionals as Supplementary Prescribers
http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4089002

- 1.33 As with other programmes we approve, supplementary prescribing programmes must show how they reflect the curriculum guidance, in this case, the outline curriculum framework for supplementary prescribing. If they do not reflect this curriculum then they would need to present evidence about how the education provider ensured that those completing the programme were safe and effective supplementary prescribers.

The outline curriculum framework for independent and supplementary prescribing

- 1.34 An outline curriculum framework is currently being developed for independent prescribing. The framework for independent prescribing has been based on the framework for supplementary prescribing which is appended to this paper. The intention is that there will be one framework which will apply to education programmes providing training in supplementary and/or independent prescribing.
- 1.35 The framework has not yet been finalised so the information in this section is subject to change. The framework currently covers the following points:
- entry requirements for the programme;
 - aims and objectives of the programme;
 - learning outcomes;
 - indicative content;
 - teaching, learning and support strategies;
 - assessment strategies;
 - length of programme; and
 - conversion programme from supplementary prescribing to independent prescribing.
- 1.36 The outline curriculum framework sets detailed requirements for education programmes in independent and supplementary prescribing. As a curriculum framework, the requirements are more prescriptive than those that we would set within our standards.

2. Approaches to regulating independent prescribing

- 2.1 Several non-medical professions currently have independent prescribing rights. These are:
- Nurses and midwives
 - Optometrists
 - Pharmacists
- 2.2 The approach that each regulator takes to ownership of a curriculum framework for independent prescribing is outlined below.

Nursing and Midwifery Council

- 2.3 The Nursing and Midwifery Council (NMC) regulates nurses and midwives. Nurses and midwives can prescribe as a community practitioner prescriber, or a supplementary/independent prescriber, depending upon their role and training.
- 2.4 The NMC sets standards of proficiency for nurse and midwife prescribers.⁶ The booklet combines the standards which education providers must meet (for example admission standards) with competency and conduct standards for the registrant (for example standards around prescribing within competency). It also identifies learning outcomes which should be included within a detailed curriculum. The standards are written at a higher level of specificity and are more detailed than the standards of proficiency that we set.
- 2.5 Neither the NMC nor the Department of Health set the curriculum framework for nurse independent prescribing as it is up to the education provider to develop their detailed curriculum based on the NMC's standards.

General Optical Council

- 2.6 The General Optical Council (GOC) registers optometrists, dispensing opticians, student opticians and optical businesses. Optometrists can prescribe as either supplementary or independent prescribers if they meet the necessary training requirements.

Handbook for optometry specialist registration in therapeutic practice

- 2.7 The handbook defines the content and standards of education and training necessary to achieve the competencies required for entry to the specialist registers in optometric independent prescribing.⁷

⁶ Standards of proficiency for nurse and midwife prescribers
www.nmc-uk.org/Educators/Standards-for-education/Standards-of-proficiency-for-nurse-and-midwife-prescribers/

⁷ Handbook for optometry specialist registration in therapeutic practice
www.optical.org/goc/filemanager/root/site_assets/education_handbooks/ip_handbook_july_08.pdf

- 2.8 The handbook brings together useful resources on prescribing from a number of topics. It covers how education providers should establish their programmes, the competency framework, the outline curriculum for prescribing and information on practice based learning.

Outline curriculum for a training programme to prepare optometrists to practise as independent/supplementary prescribers

- 2.9 The GOC sets an outline curriculum for training programmes which prepare optometrists to practise as independent or supplementary prescribers.⁸
- 2.10 The curriculum framework sets out the learning outcomes and indicative content for the training programmes. The GOC's requirements for how the programme is constructed, such as the entry requirements and assessment processes are set out separately within the handbook discussed in paragraphs 2.7 – 2.8 above.
- 2.11 Education providers must assess optometrists to check that they meet the learning outcomes set out within the outline curriculum.

General Pharmaceutical Council

- 2.12 Pharmacists can act as supplementary or independent prescribers. Pharmacist independent prescribers can prescribe for any clinical condition but they must only prescribe within their professional and clinical competence.

Pharmacist independent prescribing programme – learning outcomes and indicative content

- 2.13 The General Pharmaceutical Council (GPhC) sets the learning outcomes and indicative content for independent prescribing programmes.⁹ Education providers must demonstrate that their assessment processes check that the students meet all the learning outcomes for independent prescribing.

⁸ Outline curriculum for training programmes which prepare optometrists to practise as independent or supplementary prescribers
www.optical.org/goc/filemanager/root/site_assets/educational_curricula/independent_prescribing_curriculum.pdf

⁹ Pharmacist independent prescribing programme – learning outcomes and indicative content
www.pharmacyregulation.org/pdfs/education/pharmacistindependentprescribinglearningoutcomesandindicativesyllabus.pdf

3. Responses from professional bodies

- 3.1 The Executive contacted all the professional bodies for the professions we currently regulate to seek their views on whether or not we should own the outline curriculum framework. We are grateful to those professional bodies who replied.
- 3.2 A summary of their views is provided below.
- 3.3 Arguments in favour of HPC owning the curriculum framework:
- The extension of prescribing rights requires a robust governance structure to protect the public. It would be most appropriate if the curriculum was owned by a statutory body, to support a strong governance structure.
 - As a multi-professional regulator, HPC would be well placed to co-ordinate all the allied health professions which currently have prescribing rights.
- 3.4 Arguments against HPC owning the curriculum framework:
- It is the role of the professional body to own and develop the curriculum framework for the profession or area of practice, not the HPC.
 - The HPC does not own any other curriculum frameworks and therefore it would not be appropriate for it to own this framework.
- 3.5 In our letter to the professional bodies, we made clear that we did not intend to take ownership of any other curriculum frameworks and that our decision only related to the curriculum framework for independent and supplementary prescribing. This statement was welcomed by a number of professional bodies, including some in favour of and against our ownership of the curriculum framework.

Hosting by other organisations

- 3.6 A number of professional bodies suggested that the outline curriculum framework should be hosted by the Allied Health Professions Federation (AHPF).¹⁰ This was suggested because the overriding purpose of the AHPF is to promote inter-professional learning amongst the allied health professions.
- 3.7 It was proposed that the AHPF would host the framework on their website and then work with the relevant professional bodies and other organisations when the framework needed updating.
- 3.8 An alternative proposal similar to that outlined in the preceding paragraph was that one professional body should host the curriculum framework and seek the involvement of others where appropriate.

¹⁰ More information about the Allied Health Professions Federation can be found here: <http://www.ahpf.org.uk/>

4. Discussion

Request from the Department of Health to own the curriculum framework

- 4.1 The project board identified two key reasons for asking us to own the outline curriculum framework for education programmes to prepare Allied Health Professionals as independent and supplementary prescribers:
1. Some regulators currently own the curriculum framework for education providers offering training to their registrants in independent prescribing.
 2. As the framework relates to several allied health professions (with the potential for more professions in the future) it would not be appropriate for the curriculum framework to be owned by a single professional body.

Previous discussion by the Education and Training Committee

- 4.2 The Education and Training Committee considered the project board's request at its meeting in March 2011. The Committee's discussion can be summarised as follows:
- Responsibility for developing curricula lies with the professional bodies.
 - Administration of the framework could fit within HPC's public protection responsibilities.
 - Hosting the curriculum framework may compromise HPC's relationship with the professional bodies who are not involved in developing the framework for independent and supplementary prescribing.
 - Making the decision to own the curriculum framework might create a precedent for taking responsibility for other curriculum frameworks in the future.
 - It was important to take account of the views of the professional bodies before decisions were made about owning the curriculum framework.

The Committee asked the Executive to write to the professional bodies to seek their views on whether we should own the framework before making a recommendation to Council. The views of the professional bodies are set out in Section 3 above.

- 4.3 The Committee considered the feedback from the professional bodies and recommended that we should not take ownership of the outline curriculum framework at its meeting in June 2011. They gave the following reasons:
- The HPC fully supports the principle that it is the role of professional bodies to own, promote and develop scopes of practice and curricula.
 - The HPC does not administer curriculum frameworks for any of the professions it currently regulates. Ownership of this outline curriculum framework would be inconsistent with this approach.
 - There are other organisations, such as the Allied Health Professions Federation, which promote inter-professional learning and may be better placed to own the outline curriculum framework.

Decision

4.4 In addition to the points above, the Council may also want to consider the following:

- Whilst some professional bodies were supportive of the HPC owning the outline curriculum framework, others were not.
- The request to consider ownership of the outline curriculum framework has come from the Department of Health in England. Although the legislation that allows the extension of prescribing responsibilities applies across the UK, the devolved administrations decide whether and how it is implemented in their countries.

4.5 The Council is invited to discuss and agree the recommendation made by the Education and Training Committee that the HPC should not own the outline curriculum framework for independent prescribing.