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## **Dear Noble Lords**

Thank you for attending the session in the House of Lords on Tuesday 6th February 2024 during which I responded to a parliamentary question posed by Lord Bradley. The question sought to understand what progress His Majesty's Government has made with regard to extending prescribing responsibilities to more allied health professionals.

During the session several questions were raised on a number of different areas. I committed to providing further information regarding these and am now honouring that commitment.

As you will appreciate, prescribing is a high-risk activity and it is widely agreed that it should only be carried out by individuals in a statutorily regulated healthcare profession. There is a process in place for making changes to prescribing responsibilities to ensure proposals are safe and beneficial for patients. NHS England leads on the development of clinical cases for change, in collaboration with the professional bodies, and the Commission on Human Medicines reviews proposals and provides advice to ministers. If these are progressed, changes must be made to the Human Medicines Regulations 2012 using the powers in the Medicines and Medical Devices Act 2021, which requires a public consultation and regulations to be laid and debated in both Houses of Parliament and the Northern Ireland Assembly.

## a) Extending prescribing responsibilities for speech and language therapists, and the timeline for this

Speech and language therapists can currently supply and administer medicines under Patients Group Directions (PGDs). At present, I'm afraid, I am unable to commit to a timescale for further work on medicines supply and prescribing responsibilities for this group.

The Department of Health and Social Care is currently working through the process which will, subject to Parliamentary approval, lead to amendments to the Human Medicine Regulations (HMRs) 2012 enabling dental therapists and dental hygienists to supply and administer specific medicines under exemption and enabling pharmacy technicians to supply and administer medicines using PGDs. We aim to complete this work by the end of summer 2024.

Once those are complete, we are aware that in addition to groups such as speech and language therapists, there are some outstanding NHS England proposals for changes to prescribing responsibilities for certain professions that were previously consulted on before the Medicines and Medical Devices Act 2021 came into force. We will need to take stock and consider next steps.

## b) Extending prescribing responsibilities for psychologists

A question was raised about the potential to extend prescribing responsibilities to psychologists. You may be aware that the title 'psychologist' is not itself protected by law and only certain types of psychologists are registered with the Health and Care Professions Council (HCPC) under the broader term of 'practitioner psychologist'. There are nine regulated titles of psychologist within this group who, as they are statutorily regulated by HCPC, would meet the regulation requirement for consideration of prescribing responsibilities. However, at this stage, there are no plans to extend prescribing responsibilities to this group. Nevertheless, in regards the issue raised by Baroness Browning regarding prescribing to autistic people specifically, I have asked my officials to investigate this and my Office to set up a follow up meeting with Baroness Browning to discuss the findings.

- c) Plans to increase the number of independent prescribers being trained as part of the long-term workforce plan
  - a. with particular reference to the possibility of expanding the responsibilities of community pharmacists to include delivery of MMR vaccinations

Following reforms to pharmacist initial education and training, from 2026 all newly qualified pharmacists will be independent prescribers on the day of registration. NHS England has also funded almost 3,000 training places to upskill the existing workforce with independent prescribing qualifications and has provided a number of fully funded national training opportunities to support training of independent prescribers. This includes 1000 places for clinical examination skills training for community pharmacists and 1000 places for designated prescribing practitioners and education supervisors – roles which are critical to the development of safe and effective prescribers.

NHS England is working with Integrated Care Boards who are currently recruiting over 200 community pharmacy Pathfinder sites to establish how independent prescribers can be incorporated into clinical services available to the public through community pharmacy in the longer-term. A detailed formative and summative evaluation (undertaken by independent evaluators) will help us understand how best to incorporate independent prescribing into community pharmacy services for a future community pharmacy contract. Once the Pathfinder programme has been evaluated, we will be in a position to understand the factors which influence how independent prescribing works in community pharmacy, and to engage with stakeholders to form longer-term plans.

As regards the possibility of the government expanding pharmacist's responsibilities to include the delivery of MMR jabs to help address recent measles outbreaks. I'm afraid I indicated that pharmacists were already supplementing MMR vaccines, and this is not the case – I apologise for the error. At present, MMR vaccinations are not routinely administered in the community pharmacy setting. As part of the Vaccination Strategy, Integrated Care Boards will look at a more coherent approach to vaccines including life course vaccines and where, when, and how to deliver these to maximise uptake – particularly in underserved populations. Pharmacy teams located in the heart of communities have the potential to reach out to those groups to offer services, which could include MMR vaccinations.

## d) Statutory regulation of sports therapists

We are appreciative of the work that sports therapists do, however at present there are no current plans to statutorily regulate sports therapists. The Professional Standards Authority for Health and Social Care (PSA) runs a voluntary registers programme and provides a proportionate means of assurance for unregulated professions, such as sports therapists, that sits between employer controls and statutory regulation by setting standards for organisations holding voluntary registers for unregulated health and social care occupations. The British Association of Sport Rehabilitators and Trainers, and the Complementary and Natural Healthcare Council include sports therapy within their remits and both have registers that are currently accredited by the PSA.

You may be interested to note that regulated physiotherapists can treat sports and musculoskeletal conditions and are able supply and administer medicines under PGDs. They can also train to use supplementary prescribing.

Thank you for your contributions to this debate and I hope that above responses prove useful. I am copying this letter to all those who contributed. A copy of this letter will also be deposited in the House Library.

With my very best wishes,

LORD MARKHAM CBE

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