

Non-Medical Prescribing Strategy 2015-18

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1. Introduction

Provide is committed to improving patient access to medicines and has ensured multi-disciplinary services have evolved to meet the needs of local service users, by using non-medical prescribers (NMPs) to facilitate service design and redesign.

The organisational aims together with the strategic development of medicines management form the basis for the further development of non-medical prescribing (NMP) within the organisation with priority being afforded to:

- Enhancing the patient experience
- Optimising the skills and experience of NMPs
- Improving efficiency and effectiveness
- Improving access to treatment
- Facilitating achievement of access targets
- Responding to changes in health care delivery and national objectives
- Ensuring safe clinical practice

NMP should be considered and appropriately integrated into workforce planning processes to maximise the delivery of community services and to meet patient/service user expectations where appropriate.

Most of Provide services already use NMPs to deliver their services; this strategy includes the further development of NMP within these services and in services where NMPs are currently not identified.

2. Scope

The number of NMPs within Provide has grown steadily and further developments are planned to take advantage of legislation passed in August 2013 allowing the introduction of independent prescribing responsibilities for a wider group of healthcare professionals including physiotherapists and podiatrists. It is essential that these developments, along with the further development of NMP within Provide are supported by a robust and consistent governance framework. This will be steered by the NMP Strategy Development Group (NMP Group).

3. Aim

The aim of this document is to:

- Identify a clear framework for the ongoing development of NMP within Provide; in line with national recommendations and good practice
- Define the process for the implementation of NMP within Directorates and for individual practitioners throughout Provide
- Define the Clinical Governance Framework required to support NMP and ensure measures such as audit and evaluation are carried out effectively across services
- Ensure that patients within our care are kept safe and free from harm and that NMPs prescribe safely, efficiently, cost effectively and within their competence.
- Existing and new prescribers utilise their skills to improve patient outcomes, review performance and record and maintain their competence in prescribing.
- Improve patient choice and involvement
- Workforce development in line with service demands and professional development
- Improve the flexibility and versatility of service teams to meet patient expectations and improve patient choice

The PROVIDE Medicines Management Committee (MMC) will ratify NMP documents which have been approved by the NMP Strategy Group (a virtual group who will oversee the development of NMP within PROVIDE). See Appendix 1 for Terms of Reference for this Group

4. Duties and Responsibilities

4.1 Organisation

The development of NMP is supported by the Clinical Governance and Medicines Management systems.

4.2 The NMP Strategy Development Group

The NMP Group supported by the MMC, maintains overall responsibility for the strategic development, integration, implementation and monitoring of NMP within Provide

4.3 Line Manager

The practitioner's line manager is responsible for:

- Identifying individuals eligible for prescribing training through the staff appraisal process, where there is a service need, identified budget and indication that NMP will satisfy this need
- Supporting individuals from the application process through to completion of the course and in their new role
- Ensuring all NMP's in their area have a Personal Development Plan which includes the **MM47 Single Competency Framework for ALL prescribers** and have access to appropriate continuing professional development opportunities to enable them to maintain their prescribing competencies
- Assessing knowledge and clinical/prescribing competencies and checking prescriber activity is audited at least on an annual basis
- Ensure NMP is included in the practitioners job description
- Ensure the practitioner maintains a valid scope of practice at all times; to be reviewed annually and sent to the NMP Lead

5. Application and Registration Process

5.1 Application by Practitioners to Study NMP

In advance of an application to university practitioners are required to:

- Acquire verbal support from their Directorate manager and identify a designated medical practitioner who will act as their mentor
- Apply for Study Leave and ensure they will be released and available for all study days
- Ensure NMP has been identified within their professional duties and is clearly stated in their job description
- Have completed a CRB within the last three years (NMC requirement)
- Identify an NMP buddy who has been practising as an NMP for at least one year. This individual will promote safe prescribing and ensure studying of new prescribers meets their full potential
- Complete the online Numeracy assessment and achieve a pass mark of 100%

- Successful completion of a Consultation and Diagnostics Skills course or Advanced Clinical Skills course at level 3 or 4 or equivalent
- Contact the NMP Lead to discuss their application
- Submit a signed written application to the Chair of the NMP Group (NMP Lead) to be presented at the next appropriate meeting

If successful, the individual will be notified by the NMP Lead and Education Lead. They can then apply to the University for a Place on the next available course. Accredited training of NMPs will be undertaken at a higher education institute.

It should be noted that all of the above criteria must be fulfilled before approval to undertake a NMP Course will be given.

5.2 Selection criteria

All criteria must be met before approval will be given. See Appendix 2

5.3 Post Qualification

Practitioners who have successfully completed an accredited NMP training programme and existing NMPs who join Provide **MUST** complete the following to enable them to prescribe within Provide:

- Register their qualification with their professional body and maintain their professional registration
 - Forward the verification of prescribing status from the relevant regulatory body and a copy of the prescribing certificate to the NMP Lead; the prescriber will then be added to the NMP Register
 - Confirm arrangements for ongoing support and supervision from their medical mentor/NMP Buddy
 - Agree the parameters of their prescribing with their Line Manager and the NMP Lead and submit their completed Scope of Practice to the NMP Lead
 - All supplementary prescribers are required to develop a Clinical Management Plan for each of their patients with their Medical Practitioner and submit this to the NMP Lead for approval via the NMP Group
- NMPs will be given authority to prescribe by letter and MUST NOT start prescribing until they receive this authorisation**
- Prescription pads will be ordered for all NMPs on an individual basis by the medicines management PA as detailed in **MM57 Process for Ordering Prescription Pads for All Non-Medical Prescribers and Services Requiring Prescription Pads**

5.4 Maintaining the Non-Medical Prescribers Register

The Non-Medical Prescribers Register is stored on a central computer drive. Access is limited to the following CECS staff:

- Non-Medical Prescribing Lead – Head of Medicines Management
- Medicines Management Personal Administrative Assistant
- Education Lead- Non-Medical prescribing

The database will be used for recording:

- Details of prescribing qualification and registration with relevant regulatory body
- Work base
- Details of CPD

- Validity of Scope of Practice
- Access to clinical supervision
- The distribution of information / news to NMP's
- Details of BNF distribution
- Date last NMP update attended
- Attendance register for yearly NMP Conference

6. Accountability

6.1 Accountability of NMP

Accountability is a key element of non-medical prescribing. All registered NMPs are personally accountable for their practice and when prescribing medicines must work to the same standards and competence that applies to all other prescribers (**MM47 Single Competency Framework for all Prescribers**).

Every NMP is individually and professionally accountable for their prescribing decisions, including actions and omissions. This accountability cannot be delegated to anyone else.

Each NMP is expected at all times, to work within the standards and codes as set out by their own regulatory bodies, as well as policies and guidelines ratified by Provide.

NMPs must only prescribe within their own level of experience and competence, acting in accordance with the professional and ethical frameworks described by their professional body and within their valid scope of practice.

NMPs are required to maintain a portfolio of their continuing professional development as prescribers. It is the responsibility of the NMP to keep up to date in their field of practice and any changes in national and local policy. Individual development needs must be included in Personal Development Plans (PDPs).

NMPs can only prescribe for a patient they have assessed.

NMPs must ensure that patients are aware they are being treated by a NMP and the scope of their prescribing practice may mean referral onto another health care professional if necessary.

All NMPs are required to attend ONE NMP Conference yearly delivered by the Provide NMP Leads. These conferences run twice yearly for NMPs and HVs. Please ensure you attend the right conference.

6.2 Vicarious Liability

Provide has a duty of care to patients and holds vicarious liability for the actions or omissions of its employees.

Provide will support NMPs where the following criteria are met:

- NMP is registered with their professional body and their registration is annotated with their prescribing status
- The role of the NMP is approved by the line manager and is included in the individual's job description
- The NMP is registered on the Provide NMP Register
- The NMP works within the legal framework of their role
- The NMP maintains a valid Scope of Practice and Declaration of Practice; this requires completing on a **YEARLY** basis and must be sent to the NMP Lead (Where

a Scope of Practice is out of date the NMP and their Line Manager will be informed and the NMP will be removed from the register)

It is recommended that all prescribers should ensure they also have sufficient professional indemnity Insurance [DoH 2006; NMC 2008].

7. Development of NMP within Provide

The NMP Group has identified areas where NMP can be developed further to enhance patient care, two streams have been identified; NMP and Health Visitor prescribers (HV).

7.1 NMP

Development of NMP has been identified by service as indicated below.

NMP				
Service	Prescribing Course	No of Prescribers	Responsibility	By When
Community Hospital wards	V300 (Nurse prescriber)	2 for each hospital	Jackie Bolton Carol Doggett Juliet Hunt Libby Hanlon Lucine Holford	Dec 2017
District Nurse Course	V300 (Nurse prescriber)	All nurses undertaking this course	Jackie Bolton Carol Doggett	Dec 2017 and ongoing
Medicines Management	V300 (pharmacist prescriber)	1	Nisha Desai	Dec 2017
Sexual Health Services	V300	All	Kez Spelman	Dec 2017
COPD	V300 (Nurse)	1	Tracy Cullum	Dec 2016
COPD	V300 (Physiotherapist) (Supplementary/Independent prescriber)	2	Tracy Cullum	Dec 2017
Podiatry	V300 (Podiatrist)	1	Linda Milburn	Dec 2017

7.2 HV

All HV's are prescribers when they qualify as this is integral to their health visitor course.

HV prescribers joining Provide will need to be checked to ensure prescribing status as the previous course did not have a prescribing module.

It has been identified that this group needs further development to gain competence and essential skills in prescription writing in order to encourage prescribing. This will be addressed via the HV Conference and a sample pack of prescriptions will be developed to aid prescribing; this will be available on the intranet by March 2015.

The aim is to increase prescribing in this group to 50% by Dec 2017.

7.3 Overall Aim for NMP

The overall aim for NMP is to have independent prescribers wherever possible in all services within the next 2-5 years, with an ongoing NMP support programme and to continue to engage with Health Visitor prescribers to ensure maximum use of prescribing status.

8. CPD / NMP Conferences

8.1 Continued Professional Development (CPD)

Individuals have the professional responsibility to keep themselves up to date with best practice / evidence based practice and to maintain their prescribing competency.

Guidance for Continuing Professional Development can be found on the NMC and Non Medical Prescribing Council websites.

It is expected that CPD will enable and ensure that all nurse prescribers are able to meet the '*Standards of Proficiency for Nurse and Midwife prescribers*' (2007).

In addition, the Shipman Inquiry recommended that there should be mandatory CPD for all prescribers.

Prescribers are expected to attend any training or supervision provided by PROVIDE via the NMP Lead or Education Lead to maintain and update their knowledge and to maintain integrity of patient care.

The NMP Lead, NMP Nurse, Health Visitor Leads and Education Lead will assist with this process by:

- Ensuring that opportunities for Continued Professional Development exist internally and externally (via Higher Education Institutions) and staff are supported to access these.
- Providing advice regarding ongoing CPD through the NMP Lead and the Education Lead
- Line management support at annual appraisal and inclusion of NMP CPD in the individual Personal Development Plan [PDP] alongside the adherence to **MM47 Single Competency Framework for all Prescribers**
- Providing and supporting the opportunity for clinical supervision
- Supporting all Non-Medical Prescribers to uphold their mandatory requirement to attend an annual update provided by the HEI or other appropriate organisation
- Ensuring that all NMP's have a portfolio for the collation of evidence for use at appraisal and supervision of NMP

Attendance details of Provide organised CPD and HEI mandatory updates will be kept within a 'Non-Medical Prescribers' folder on the NMP database. The Education Lead and the NMP Leads will follow up any non-attendance and report these to the NMP Lead

8.2 NMP/HV Provide Conference

All NMP's and HV's are expected to **attend one conference per year**; this will provide legal and national updates. Two NMP Conference and Two HV Conferences will be held each year.

For clinical updates NMP's and HV'S are advised to seek updates via Higher Education Institutes and CPD options.

9. Monitoring of Compliance and Effectiveness

Electronic Prescription Analysis and Cost (ePACT) data is made available to the Head of Medicines Management. This information will be fed back to the NMP Group and to MMC at least twice yearly.

The NMP group will be able to support the feedback of prescribing activity to individual prescribers and follow up any non-prescribing if no activity is recorded in a 12 month period.

ePACT will also enable the medicines management team to monitor prescribing practice for individual NMP prescribers via EPACT to ensure prescribing is in line with competence and scope of practice; this will also help to link activity with prescription pad orders to ensure the ordering and use of these is measured and appropriate.

NMP's who prescribe for inpatients are required to complete the prescribing monitoring form (Appendix 6) on a quarterly basis and send completed form to the NMP Lead for Non-Medical Prescribing.

10. Clinical Governance – Patient Safety

Patient safety and assurance must be paramount in any plan to extend Non-Medical Prescribing. Provide will do this by:

10.1 Competency

Provide has adopted the **MM47 Single Competency Framework for all Prescribers** and this document should be used at PDP's to ensure NMPs meet the competencies to ensure safe prescribing practice.

An audit template will be developed to support the use of this framework within Provide by March 2015.

10.2 Accountability Arrangements

The NMP Lead for Provide is the Head of Medicines Management. The NMP Lead will oversee the development, implementation and provision of NMP within Provide; provide a strategic direction for the development of NMP and a robust Clinical Governance Framework to ensure professional accountability within Provide for all NMP's.

The NMP Lead will work closely with the NMP Lead Nurses and Lead Health Visitors and the NMP Education Lead to support this.

All non-medical prescribers are contractually responsible to their Line Manager for their prescribing activity.

All prescribers must be registered with and are accountable to the professional body. They are required to work within their scope of their professional practice and in line with standards of proficiency as laid down by their regulatory body.

In addition to the above statutory requirements, all non-medical prescribers are required to practice according to the Provide Non-Medical Prescribing Policy and **only within their areas of competence.**

The Medicines Management Team are accountable for ensuring that new prescribers are authorised to prescribe and that appropriate administrative systems and processes are followed in relation to the issuing, receipt and retrieval of prescription pads.

Provide holds vicarious liability for the prescribing actions of all appropriately trained and qualified Non-Medical Prescribers, **providing the individual adheres to all prescribing and medicines management policies and works within their area of competence.**

However, it is recommended that all prescribing individuals ensure they have professional indemnity insurance through membership of their professional body or trade union. Individuals who take out extra indemnity insurance do so at their own cost.

10.1 Risk Management

Adherence to the NMP Policy is mandatory and all new and existing prescribers will be required to make a formal yearly declaration to support this.

Non-medical prescribers will only prescribe within the scope of their Professional competence. The area of prescribing appropriate for the role will be defined within the individual's job description and within the NMP application process.

Any prescribing incident(s) will be reported via Datix – including lost or stolen prescription pads and will follow any investigations, incident analysis and onward reporting as per the NMP policy.

Any adverse reaction to a medication will be reported to the patients GP and via Datix and through the Medicines and Healthcare Products Regulatory Agency (MHRA).

Any drug listed as 'Black triangle' must have any adverse reactions reported to the MHRA by the person to whom the adverse reaction has been reported.

Any areas of risk, identified as associated with NMP will be reported to the line manager and in turn to the Head of Medicines Management (NMP Lead). Any incidents defined as significant risks will be reported via Line Managers to Quality and Safety.

Note: Prescriptions Pads are Controlled Stationary and therefore must be handled with care and are the responsibility of the prescriber whilst in their possession.

Please refer to the NMP Policy re processes for lost, stolen and missing prescription pads and the Medicines Management Policy re Controlled Stationary.

10.2 Performance Monitoring

The Medicines Management team will monitor activity of non-medical prescribers, including levels of prescribing and compliance with local formulary and provide data to the NMP Group and MMC

Non-medical prescribers will receive information regarding their prescribing activity three times a year, in line with medical prescribers.

Prescribing skills and competence will be discussed at the individual prescribers annual appraisal with their line manager **AND ANY SHORTFALLS WILL BE REPORTED TO THE NMP Lead**

Appendix 1: Terms of Reference Non-Medical Prescribing Strategy

Group (NMP Group)

Membership

Role	Name
Chairman and NMP Lead (Head of Pharmacy and Medicines Management)	Nisha Desai
PA/Minutes	Deana Worster
NMP Nurse Leads	Nikki Brockbank Jane Gregson
HV Leads	Therese McCarrick-Roe
NMP Education Lead	Judi Wren
Clinical Governance	Jayne Peden
Children's Services/Health Improvement	Debbie Whitehouse
Community Hospitals	Juliet Hunt Libby Hanlon Lucine Holford
Respiratory Nurse	Ruth Barlow Tracy Cullum
Sexual Health Nurse Specialist	Kez Spelman
Podiatry	Michelle Brooke-Haughton

Aims and Objectives

The group will be responsible for:

- The development of NMP strategy and related policies
- A conduit through which two way feedback to and from Provide MMC on all NMP related issues including incidents and causes for concern
- First stage discussion of NMP strategic direction and objectives prior to seeking approval from MMC
- For service-side representatives to update and discuss any relevant operational issues, competence issues and performance
- Analysis and discussion of NMP performance indicators and financial and governance issues
- First stage discussion and approval of NMP developments

This panel are expected to meet twice yearly to evaluate NMP within Provide. All other communications will be virtual.

Terms of Reference

- Ensure that the Clinical Governance Framework, NMP Strategy and NMP Policy documents are robust, in date and support NMP development within Provide
- Ensure that course application is related to service need and each applicant will be able to prescribe on qualification
- Ensure the application and qualification processes including legal requirements, prescribing budgets and CPD budgets are identified within the service
- Ensure that robust Clinical Governance, risk management and audit arrangements are in place and that Medicines Management is integrated within the service
- Identify and utilize the skills and experience of existing and new mentors and non-medical prescribers to support and extend the role to new applicants, where appropriate
- Keep updated with prescribing issues / news from DoH, NMC and HPC that may require implementation / innovation
- Feedback on progress of Non-Medical Prescribing and any unresolved problems or issues to the MMC
- Further development of a multidisciplinary NMP Forum for CPD, legislative updates, problem sharing and solving across professional groups

Accountability

This group will report to the MMC.

Appendix 2: Prerequisites for Practitioners applying to undertake an accredited NMP training programme

All applicants must

- Have a valid registration with their professional body
- Be appointed to a substantive post where they will have the need and opportunity to act as an independent / supplementary prescriber upon qualification.
- Demonstrate the ability to study at degree level for Higher Education level 3 or 4
- Demonstrate Clinical Skills experience (preferably as a formal qualification)
- Have completed a CRB check within the last 3 years (NMC requirement)
- The Numeracy assessment must be completed and a pass mark of 100% achieved before approval of applications
- Identify a Designated Medical Prescriber (DMP) who will be willing / able to contribute to and supervise the 'learning in practice' element of their training and provide post qualification clinical supervision.

Additional requirements

First level Registered Nurses:

- First Level Nurse, Registered with the Nursing and Midwifery Council (NMC)
- Have at least three years post-registration experience of which at least one year immediately preceding their application must be in the clinical area in which they intend to prescribe.
- Provide evidence of competence in history taking, undertaking a clinical assessment and making a diagnosis i.e. comprehensively assess a patient's physiological and/or psychological condition, understand the underlying pathology and identify the appropriate medicines regime.

Registered Pharmacists:

- A pharmacist, registered with the General Pharmaceutical Council (GPhC)
- Have at least three years' experience practicing as a registered pharmacist in a clinical environment (hospital or community), and at least one year immediately preceding their application must be in the clinical area in which they intend to prescribe.
- Be able to demonstrate competence to prescribe in the area in which they will prescribe following training.

Registered Physiotherapists, Chiropodists / Podiatrists

- An AHP, registered with the Health Professional Council (HCP)
- Be a senior practitioner with at least three years post-registration experience of which at least one year immediately preceding their application must be in the clinical area in which they intend to prescribe. It is highly likely that individuals will be practitioners in senior clinical / specialist posts.
- Be able to demonstrate competence to prescribe in the clinical area in which they will prescribe following training.