

## **POLICY NOTE**

### **THE NATIONAL HEALTH SERVICE (DIETITIAN SUPPLEMENTARY PRESCRIBERS AND THERAPEUTIC RADIOGRAPHER INDEPENDENT PRESCRIBERS) (MISCELLANEOUS AMENDMENTS) (SCOTLAND) REGULATIONS 2016**

#### **SSI 2016/393**

The above instrument was made in exercise of the powers conferred by sections 17E(1), 17N(1) and 27(1) and (1A) of the National Health Service (Scotland) Act 1978. The instrument is subject to negative procedure.

#### **Policy Objective and Background**

The Human Medicines Regulations 2012 (S.I. 2012/1916) (“**2012 Regulations**”) were amended in 2016 to allow supplementary prescribing by dietitians and independent prescribing by therapeutic radiographers.

The instrument amends:

- the National Health Service (General Medical Services Contracts) (Scotland) Regulations 2004,
- the National Health Service (Primary Medical Services Section 17C Agreements) (Scotland) Regulations 2004, and
- the National Health Service (Pharmaceutical Services) (Scotland) Regulations 2009

To update the arrangements for prescribing under General Medical Services Contracts and Primary Medical Services Section 17C Agreements, and in relation to pharmaceutical services to reflect the introduction of supplementary prescribing by dietitians and independent prescribing by therapeutic radiographers under the 2012 Regulations.

The extension of prescribing rights under the 2012 Regulations is designed to ensure that patients will be able to receive the care and medicines they need, without having to make additional appointments with other prescribers. A greater number of patients could benefit from improved care, first time and in the right place and would also support changes to models of service delivery in both in the community setting and in acute hospital setting.

#### **Consultation**

UK wide public consultation exercises took place in 2015 on proposals to amend the 2012 Regulations by the introduction of supplementary prescribing by dietitians and independent prescribing by therapeutic radiographers, with an overwhelming consensus in support of this extension of prescribing rights. Given this, no further consultations were undertaken in respect of the instrument.

#### **Timing**

The instrument comes into force on 31st December 2016.

## **Impact Assessment**

During the 2015 consultation, separate Impact Assessments were undertaken regarding the initial proposal to enable independent prescribing by therapeutic radiographers and supplementary prescribing by dietitians. This forecast net benefits from implementation of the proposals, as a result of a range of factors including: improved outcomes, reductions in referrals, a better patient experience and widening of access which in turn may serve to address health inequalities in some settings.

For this reason, no further impact assessment has been undertaken in respect of the instrument.

## **Financial Effects**

The Impact Assessments for dietitians and therapeutic radiographers undertaken during the 2015 consultation also considered the economic case for the changes across the UK for both professional groups. The Impact Assessments concluded that there is potential to increase efficiency by reducing costs and improving health outcomes by more effective use of allied health professionals with advanced skills and training to meet some of the excess demand for services. Indirect financial benefits of the change would include a potential reduction in GP appointments, reduction in hospital admissions and reduction in outpatient appointments.

There will be no adverse financial effects associated with the instrument. No adverse financial impact has been noted when other professional groups have received extended prescribing rights and none are expected in this case.

With this in mind it was concluded that a Business and Regulatory Impact Assessment was not necessary.

**Scottish Government  
Health and Social Care Directorate**