

OUTCOME OF MLX 371

Consultation letter MLX 371 was issued on 24 August with a deadline for comments of 19 November. It was circulated to a range of interested organisations throughout the UK and a copy appeared on the MHRA website. The MHRA received 158 responses, of which 57 related to the devolved administrations. In view of the numbers involved, officials in the devolved administrations agreed that this paper should cover all the replies rather than providing a breakdown of those relating to individual countries. The replies can be broadly categorised as follows:

- Medical/Pharmaceutical Organisations 5
- Midwifery Bodies 1
- Other organisations/bodies 6
- NHS bodies 20
- Individuals 126

One hundred and thirty five (135) of the replies expressed broad support for the proposals. Twenty two (22) responses made no comments specifically relating to the proposals or expressed no preference. One anonymous reply opposed the proposal to allow student midwives to administer medicines. This was on the basis that a midwifery qualification used to be preceded by a nursing degree so it was customary for student midwives to administer medicines but this was no longer the case. Other responses, while supportive, commented or raised concerns about particular aspects of this proposal. The proposal for updating the midwives' list by removing several medicines which are no longer available and correcting two technical errors was generally accepted without further comment. Therefore, the summary below focuses on comments relating to student midwives administering medicines.

SUMMARY OF COMMENTS RECEIVED FROM MAJOR ORGANISATIONS AND INTERESTS

Medical and Pharmaceutical Organisations

The **Royal College of Obstetricians and Gynaecologists** supported the proposals. The **British Medical Association (BMA)** were also supportive noting that nurses and other health professionals remain accountable to their own professional bodies and in some circumstances they are recognised as assuming significant responsibility for a particular patient's care in community midwifery and midwifery led units especially and stand alone midwifery birthing centres. The BMA took the view that allowing student midwives to administer medication under the supervision of an appropriately qualified midwife would be a favourable way for them to gain experience and learn how to carry out procedures correctly. They believed that administration of drugs listed in the consultation "under direct supervision" should be a key competency for student midwives to attain during their training.

The **Company Chemists Association** and the **Association of Independent Multiple Pharmacies (AIMp)** responding jointly, believed the proposal would

enhance the learning experience of student midwives and ultimately lead to improved patient care. However, they urged caution when defining the situations under which the above supervised administration is allowed so as to ensure adequate protection for patients. The **Guild of Healthcare Pharmacists** did not foresee any problems with the proposed change in legislation providing a registered midwife directly supervises the student midwife. Similarly, the **Pharmaceutical Society of Northern Ireland** considered the proposal to be proportionate and reasonable but again subject to the requirement that the administration only takes place under the direct supervision of a registered midwife.

Midwifery Organisations/Bodies

The **Royal College of Midwives** said they welcomed any move that enables students to gain practical hands on experience prior to registration. They were concerned at the increasing number of skills that midwives (and nurses) cannot gain until they are qualified.

Other Organisations/Bodies

Replies in this category were mainly from higher education institutions. Several of the responses commented on the exclusion of controlled drugs from the proposal. For example, one reply noted that students should also be educated during their programme to administer these medicines under direct supervision of a midwife, as they are still actively used in today's maternity care.

NHS bodies

There were relatively few substantive replies in this category. One response expressed concerns about accountability and asked at what stage students would be able to administer the medicines. Two responses felt that controlled drugs should have been included in the proposal. One reason for this was that student midwives need to learn about the safe use and administration of controlled drugs throughout their training. Historically student midwives have always been involved in the administration of pain relief from the group of controlled drugs. Many student midwives are active learners whose breadth of knowledge and understanding increase with the ability to undertake tasks, these learners may not benefit from theoretical discussion alone.

Individuals

Several themes arose from the individual responses. Several respondents did not agree with the exclusion of controlled drugs from the proposals and thought there should be a further consultation to address this issue. Replies noted that experience of parenteral medicines administrations by student midwives was key to their being fit to enter the register. There was disagreement that students could achieve competence without administering controlled drugs. It was not just the skill of administration; it was also practical experience of leading and completing the checking, administration and completing the register that cannot be fully appreciated by observation only. Another reply said that there was limited use of non-CDs in maternity care and expressed concerns that student midwives would not be competent at point of registration.

Other issues included supervision of the student. A number of replies commented that the requirement for direct supervision should be made clear. Adequate supervision needed to be maintained to the point of registration. Other responses sought clarification on accountability, why oral medicines were excluded and what stage in the student's training would they be allowed to administer medicines.