

Frequently asked questions about becoming a prescriber for clinicians working in new or modified roles and their managers

Clinical roles are constantly changing and adapting to take account of advances in treatments and technologies, new ways of working, and workforce shortages. However, there is often a lag between changes in practice and updates to legislation, regulations and guidance for clinicians. This can make it challenging for clinicians working in new or modified roles and their managers, but there are clear legal frameworks in place to guide the scope of practice for different professionals.

In response to questions from clinicians within the Excellence Network about the rules around prescribing for Parkinson's Practitioners, we have developed this document to support you as you look to grow and develop your service. We would recommend that you also seek advice and clarification from the relevant professional body and your employing organisation.

1. How do I find out if my professional registration enables me to prescribe?

The GMC regulates doctors, the NMC regulates nurses and midwives, and the Health and Care Professions Council (HCPC) regulates 15 recognised allied health professional roles. All professions have to work within their legally defined scope of practice and not all are able to prescribe.

All doctors and nurses are entitled to become independent prescribers subject to the right training and qualifications.

Some allied health professionals (AHPs) are also entitled to prescribe, either as an independent prescriber or a supplementary prescriber. [The Health & Care Professions Council \(HCPC\) website](#) has a list of the allied health professions and “protected titles” that it regulates (see Q3). Some allied health professions have “annotations” around prescribing. This means that they may be entitled to become independent or supplementary prescribers. You should therefore check the HCPC website to see if your profession is there and whether it has any annotations around prescribing.

2. What are the different types of prescribing rights?

There are two types of prescribing: independent prescribing (IP) and supplementary prescribing (SP)¹.

Independent prescribing

Independent prescribing is prescribing by a practitioner who is responsible and accountable for the assessment of service users with undiagnosed or diagnosed conditions and for decisions about the clinical management required.

An independent prescriber is able to prescribe on their own initiative any medicine within their scope of practice and relevant legislation.

Supplementary prescribing

Supplementary prescribing is a voluntary partnership between a doctor or dentist and a supplementary prescriber to prescribe within an agreed service user-specific clinical management plan (CMP). This is a written plan agreed between a doctor or dentist and a supplementary prescriber for the treatment of a named service user, with the knowledge and agreement of the service user or carer. The plan outlines the illnesses or conditions that may be treated by the supplementary prescriber, the types of medicines they may prescribe, and any limits to the strength or dose of medicines that they may prescribe.

Once qualified a supplementary prescriber may prescribe any medicine within their clinical competence, within the limits of the CMP.

¹ <https://www.hcpc-uk.org/check-the-register/additional-entitlements/>

3. What should I do if my allied health profession or current job title does not appear on the HCPC list?

The professions the HCPC regulates have one or more designated titles that are protected by law and professionals must be registered to use them. Article 39(1) of the [Health Professions Order 2001](#) makes it a criminal offence for a person, with intent to deceive (whether clearly or by implication) to:

- say that they are on the HCPC Register;
- use a designated title to which they are not entitled; or
- say falsely that they have qualifications in a profession we regulate.
- The words “by implication” mean that an unregistered person may be committing an offence even if they do not use the designated title directly (for example, if they describe the service they provide as “chiropody” or “physiotherapy”).

If your profession or job title does not appear on the list on the HCPC [website](#), we would advise you to contact your employer or the HCPC to seek clarification over your prescribing rights.

4. I have moved into a role where I am no longer using my protected title as defined by the HCPC. What does this mean for my practice?

When moving into a new role, or if your scope of practice changes, you must consider whether your knowledge, skills and experience are sufficient to perform the new scope of practice safely and effectively.

If you have any gaps in your knowledge, skills or experience it is important you address them with additional training or support. The level of knowledge, skills and experience required for each role will be informed by your employer and guidance from the professional body. Local guidance and policies may also set out training requirements for certain roles. You should also check that your employing organisation has appropriate professional indemnity insurance to cover you in your new role.

An HCPC registrant can practise in a role which is not their protected title (for example, a physiotherapist practising as a Parkinson’s practitioner) and remain registered, even if this new role has a narrower scope of practice. The HCPC does not penalise registrants simply because they are acting in a capacity that is more limited than their protected title. If you are practising in a narrower role than your protected title, the HCPC would

expect you to work within the limits and expectations of that new role. You might find it helpful to check your job description or clarify this with your employer.

The limits and expectations of your new role would then form your particular scope of practice. You must make sure that you keep within your scope of practice and do not practise in areas which go beyond it.

This might require you to limit the activities you perform or the skills you exercise to the activities or skills required by your job description (even if you would be qualified to undertake them if you were practising in your protected title).

5. I am now employed in the role of a Parkinson's Practitioner and this does not appear as an HCPC protected title. Can I prescribe?

If you are **not** currently employed in a role where you are using your protected title and you are working outside of your professional scope of practice, then you may not have the same rights, responsibilities and protection. This may affect your ability to prescribe.

For example where an HCPC registrant is not using the protected title "Physiotherapist" but rather "Parkinson's Practitioner" and is prescribing outside of their physiotherapist scope of practice, they may not be able to act as an independent prescriber. This is because the ability to prescribe is conferred by their registration as a physiotherapist and their scope of practice in that role.

In this instance you should check your prescribing rights with your employer and the HCPC before you undertake any prescribing activity. You should also check that your employing organisation has appropriate professional indemnity insurance to cover your prescribing activity in your new role.

6. How is a new role or designated job title granted prescribing rights?

Changes to a profession's medicines and prescribing rights are not led by the HCPC. This is because a change in law is required. Instead this work is initially led by NHS England. They work with professional bodies on behalf of the four countries of the UK to consider the supply, administration and prescribing of medicines by new professions.

If you would like to lobby for changes to medicines and prescribing law, we recommend that you contact your professional body or your MP. The more people who do this, the stronger the case for change will be.

7. What should I do if I have any further questions or queries about my rights as a prescriber?

Check the [HCPC website](#), which has a number of resources and an FAQ section to advise and guide you. You should also talk to your employer, check their policies and procedures and ensure that you are covered by the relevant indemnity insurance.