

Response ID ANON-W9P2-X5KM-Q

Submitted to **Consultation on the proposal for the supply and administration of medicines under exemptions within the Human Medicines Regulations 2012 by dental hygienists and dental therapists across the United Kingdom**

Submitted on 2020-12-10 12:17:34

The proposal

1a Should amendments to legislation be made to enable DENTAL HYGIENISTS to supply and administer specifically listed medicines to their patients using exemptions?

Yes

Please give reasons for your choice::

This would simplify the processes within all sectors of dentistry, could improve patient flow and will give recognition and, therefore, better professional fulfilment and worth to dental hygienists.

It may also allow greater access to dental services for patient groups that do not use dental services. These people often have protected characteristics or are socially disadvantaged.

1b Should amendments to legislation be made to enable DENTAL THERAPISTS to supply and administer specifically listed medicines to their patients using exemptions?

Yes

Please give reasons for your choice::

This would simplify the processes within all sectors of dentistry, could improve patient flow and will give recognition and, therefore, better professional fulfilment and worth to dental therapists.

It may also allow greater access to dental services for patient groups that do not use dental services. These people often have protected characteristics or are socially disadvantaged.

2a Do you have any additional information on any aspects not already considered as to why the proposal to enable DENTAL HYGIENISTS to supply and administer specifically listed medicines to their patients using exemptions SHOULD go forward?

No

Please provide any additional information::

2b Do you have any additional information on any aspects not already considered as to why the proposal to enable DENTAL THERAPISTS to supply and administer specifically listed medicines to their patients using exemptions SHOULD go forward?

No

Please provide any additional information::

3a Do you have any additional information on any aspects not already considered as to why the proposal to enable DENTAL HYGIENISTS to supply and administer specifically listed medicines to their patients using exemptions SHOULD NOT go forward?

No

Please provide any additional information::

3b Do you have any additional information on any aspects not already considered as to why the proposal to enable DENTAL THERAPISTS to supply and administer specifically listed medicines to their patients using exemptions SHOULD NOT go forward?

No

Please provide any additional information::

Proposed medicines

4 Please indicate to what extent you agree or disagree with each of the proposed medicines that DENTAL HYGIENISTS and DENTAL THERAPISTS would be able to ADMINISTER under exemptions within the Human Medicines Regulations:

4a) Lidocaine with adrenaline (injection) - local anaesthetic - Dental hygienist:

Strongly agree

4a) Lidocaine with adrenaline (injection) - local anaesthetic - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups.

4b) Articaine hydrochloride with adrenaline (injection) - local anaesthetic - Dental hygienist:

Strongly agree

4b) Articaine hydrochloride with adrenaline (injection) - local anaesthetic - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups. Perhaps its use should be limited to infiltrations and should exclude nerve blocks.

4c) Mepivacaine hydrochloride (injection) - local anaesthetic - Dental hygienist:

Strongly agree

4c) Mepivacaine hydrochloride (injection) - local anaesthetic - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups.

4d) Prilocaine with felypressin (injection) - local anaesthetic - Dental hygienist:

Strongly agree

4d) Prilocaine with felypressin (injection) - local anaesthetic - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups.

4e) Lidocaine and prilocaine (periodontal gel) - local anaesthetic - Dental hygienist:

Strongly agree

4e) Lidocaine and prilocaine (periodontal gel) - local anaesthetic - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups.

4f) Sodium fluoride (varnish) – mineral replacement - Dental hygienist:

Strongly agree

4f) Sodium fluoride (varnish) – mineral replacement - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups. In addition, primary and secondary prevention should be the focus of dental services to reduce the future burden of interventional dental treatment.

4g) Minocycline (periodontal gel) – antibiotic - Dental hygienist:

Neither agree nor disagree

4g) Minocycline (periodontal gel) – antibiotic - Dental therapist:

Neither agree nor disagree

Please give reasons for your choices::

There is little evidence for the efficacy of this treatment and therefore it is questionable if this medicine is indicated,

5 Please indicate to what extent you agree or disagree with each of the proposed medicines that DENTAL HYGIENISTS and DENTAL THERAPISTS would be able to SUPPLY under exemptions within the Human Medicines Regulations:

5a) Sodium fluoride (dental paste) – mineral replacement - Dental hygienist:

Strongly agree

5a) Sodium fluoride (dental paste) – mineral replacement - Dental therapist:

Strongly agree

Please give reasons for your choices::

This medicine is currently used routinely by these staff groups.

5b) Nystatin oral suspension – antifungal - Dental hygienist:

Disagree

5b) Nystatin oral suspension – antifungal - Dental therapist:

Disagree

Please give reasons for your choices::

This medicine is used to treat a condition that is commonly related to dentures. As such it is out with the scope of practice of hygienists/therapists.

Supporting documents

6 Draft Practice Guidance:

No

Please provide your suggestions::

This is a comprehensive document but needs to be reviewed in light of any changes in legislation following this consultation.

7 Draft Outline Curriculum Framework:

Yes

Please provide your suggestions::

Linking the education to a sole provider has proven challenging and highly restrictive for the profession in similar cases eg Adults With Incapacity training – this required a subsequent change in legislation in Scotland. Hopefully learning from that situation can be used to prevent future problems.

Asking the FGDP(UK) to keep a register is out with their normal role and would involve significant challenges and would have reputational risk and governance risks for the organisation.

This needs significant work with the Schools of Hygiene and Therapy.

Consultation Stage Impact Assessment

8 Does the Consultation Stage Impact Assessment give a realistic indication of the likely costs, benefits and risks of the proposal? Please select the options that best apply.

Does the Consultation Stage Impact Assessment give a realistic indication of the likely costs, benefits and risks of the proposal? - a) Costs:

Don't know

Does the Consultation Stage Impact Assessment give a realistic indication of the likely costs, benefits and risks of the proposal? - b) Benefits:

Don't know

Does the Consultation Stage Impact Assessment give a realistic indication of the likely costs, benefits and risks of the proposal? - c) Risks:

Don't know

Please give reasons for your choices::

Equalities and health inequalities

9 Do you think that this proposal could impact (positively or negatively) on any of the protected characteristics covered by the Public Sector Equality Duty set out in section 149 of the Equality Act 2010 or by section 75(1) of the Northern Ireland Act 1998?

Yes

Please give reasons for your choice::

It could positively impact on protected groups by making patient journeys slightly more stream-lined and flexible.

10 Do you feel that this proposal could impact (positively or negatively) on health inequalities experienced by certain groups?

Yes

Please give reasons for your choice::

It could positively impact on protected groups by making patient journeys slightly more stream-lined and flexible.

Information about you or your organisation

11 Are you responding:

On behalf of an organisation

Responding on behalf of an organisation

14 Please tell us which organisation you are responding on behalf of:

Name of organisation: :

Royal College of Physicians and Surgeons of Glasgow

15 Please choose the option below which best describes your organisation:

Healthcare profession representative group

If you selected 'Other' please specify::

16 This is a UK-wide consultation; is the remit of your organisation:

UK-wide

If you selected 'Other' please specify ::

About you

17 Which age group are you in?

Prefer not to say

18 Please indicate your gender:

Prefer not to say

19 Do you consider yourself to have a disability?

Prefer not to say

20 Please select what you consider your ethnic origin to be. Ethnicity is distinct from nationality.

Prefer not to answer

Not Answered

Other::

Not Answered

Other::

Not Answered

Other::

Not Answered

Other::

Not Answered

Other::

21 Please indicate your religion or belief:

Not Answered

Other::

22 Please indicate the option which best describes your sexual orientation:

Not Answered