Bord Altranais agus Cnáimhseachais na hÉireann

Nursing and Midwifery Board of Ireland

5 September 2013

Department of Health:

Consultation on Draft Misuse of Drugs (Amendment) Regulations, 2013

Nursing and Midwifery Board of Ireland Submission

Bord Altranais agus Cnáimhseachais na hÉireann (the Nursing and Midwifery Board of Ireland (NMBI)) is the statutory body which provides for the registration, control and education of nurses and midwives and for other matters relating to the professions and the practice of nursing and midwifery. The *Nurses and Midwives Act of 2011* states that the object of the Board "shall be the protection of the public in its dealings with nurses and midwives and the integrity of the practice of nursing and midwifery through the promotion of high standards of professional education, training, and practice and professional conduct among nurses and midwives".

NMBI welcomes the public consultation being conducted by the Department of the Health to amend the Misuse of Drugs Regulations, 1988 as amended. The Board reviewed the *Consultation Draft,* with the accompanying *Consultation document* and *Unofficial Consolidation document for the Misuse of Drugs Regulations 1988* to inform its submission. The *Consultation document* was very useful to refer to in considering the various proposed amendments to the current Regulations which were detailed in the Consultation Draft.

NMBI supports the Department's objectives in amending the legislation which include:

- tightening controls to address the public health issue of the illegal supply of benzodiazepines and z-drugs
- expanding the prescriptive authority of RNPs for MDAs with a revised list of controlled drugs and clinical situations.

NMBI has established regulatory and professional guidance frameworks for Registered Nurse Prescribers (RNPs) founded on the medicines legislation and best practice standards. These frameworks include the Practice Standards and Guidelines for Nurses and Midwives with Prescriptive Authority (2010), Collaborative Practice Agreement (2012). There are currently 608 RNPs and 378 Candidates on the Nurse Prescribers Division of the NMBI Register. Additionally Guidance to Nurses and Midwives on Medication Management (2007) (which encompasses guidance on the

supply, possession and management of MDA medications) assist registrants to understand their roles and responsibilities with medications.

The changes proposed in the draft MDA regulations will have implications across the nursing and midwifery spectrum. Some key observations from NMBI regarding the draft Regulations are:

- the expansion of MDA Schedule 8 will enable RNPs to greater meet the medication management needs of patient/service user in relation to pain management and palliative care.
- the clarity provided for the use of methylphenidate for mental health and intellectual disability situations is appreciated as current restrictions of this medication have caused challenges for RNPS.
- in circumstances where pharmacy services are not available for supplying a controlled drug specified in Schedule 2, 3 or part 1 of 4 (as cited in the draft Regulation Article 16A) could there be service implications for directors of nursing/matrons in relation to reporting and documentation requirements.
- dissemination and communication of the final regulations will need to be prioritised by NMBI (and other stakeholders) particularly in relation to the changes for Schedule 4 Parts 1 & 2 and the associated documentation and recording requirements.

In carrying out its regulatory functions in the interest of the public, NMBI is committed to working with the Department of Health and other stakeholders to ensure registered nurses and registered midwives are informed of these important changes for MDA regulations in the context of their professional practice.

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