



Professor Owen Bowden-Jones
Chair of Advisory Council on the Misuse of Drugs and
Professor Roger Knaggs, Chair of the Advisory Council on the Misuse of
Drugs' Technical Committee

c/o Zahi Sulaiman
Secretary to the Advisory Council on the Misuse of Drugs (ACMD)
Home Office Science Secretariat
Home Office
1st Floor (NE),
Peel Building
2 Marsham Street
London SW1P 4DF

30 September 2022

Dear Owen and Roger,

RE: ACMD advice on independent prescribing of controlled drugs from a restricted list by paramedic independent prescribers and on the administration rights of therapeutic radiographer independent prescribers

I am grateful for the ACMD's advice on independent prescribing and administration of controlled drugs from a restricted list by paramedic independent prescribers, dated 18 October 2019, and for the Annex to the ACMD's advice on therapeutic radiographer independent prescribers of 22 April 2020. I would like to thank the ACMD and in particular, the Technical Committee for its careful consideration and recommendation. The Home Office and the Department of Health and Social Care (DHSC) have worked together to consider the recommendations. Please accept my apologies for the delay in responding.

The ACMD's recommendation of 2019 was "that the Misuse of Drugs Regulations 2001 are amended to allow paramedic independent prescribers to independently prescribe and administer the 5 controlled drugs specified in Annex 1. The drugs specified in Annex 1 were as follows:

Controlled Drug	Schedule (MDR)	Route of administration
Morphine sulfate	2 or 5 (concentration-dependent)	Oral and injection

Diazepam	4	Oral and injection
Midazolam	3	Oromucosal and injection
Lorazepam	4	Injection
Codeine phosphate	5	Oral

I note that the ACMD has been assured by NHS England that paramedic independent prescribers will receive appropriate training in order to practice as independent prescribers under the Misuse of Drugs Regulations 2001. As such, I accept the recommendation from the ACMD to amend the Misuse of Drugs Regulations 2001 to authorise paramedic independent prescribers to independently prescribe and administer, and direct others to administer, the five controlled drugs listed, by the specified routes of administration.

The Home Office previously accepted the ACMD recommendation to allow independent prescribing of six controlled drugs by therapeutic radiographer independent prescribers (19 December 2018). I now also accept the additional recommendation that therapeutic radiographer independent prescribers may administer, or direct others to administer, such drugs by the specified route of administration under the Misuse of Drugs Regulations 2001.

In addition, I intend that the regulations will make the following technical amendments to correct anomalies:

- a) Making it explicit that patient possession, pursuant to a prescription by a chiropodist or physiotherapist independent prescriber, is lawful.
- b) Making it explicit that a prescription issued by a chiropodist or physiotherapist independent prescriber is a "prescription" for the purposes of the 2001 Regulations.
- c) To correct a cross-reference to specify that possession of ketamine by health care professionals that supply or administer controlled drugs under Patient Group Directions (PGDs) is lawful, as intended.

These corrections will ensure that previous ACMD advice is properly implemented, and I am not therefore commissioning new ACMD advice on these points. I understand that the NHS and DHSC are conducting further work on prescribing by various professional groups and will seek further advice from the ACMD shortly.

I have asked Home Office officials to commence the process for regulatory changes which will implement both pieces of advice and make the technical amendments above.

My thanks again to the ACMD for its technical advice and the invaluable work it continues to do.

A handwritten signature in black ink, appearing to read 'Jeremy Quin', with a small horizontal line at the end.

Jeremy Quin MP
Minister of State at the Home Office