

# Checklist for administration of medicines by registered healthcare professionals (excluding doctors, nurses, midwives, and operating department practitioners)



## Introduction

Any person can legally administer a medicine but in healthcare settings, organisational policies specify who can do this and the associated medicines governance processes, training and competency assessments required.

For NHS Lothian, the requirements are defined in *the safe use of medicines policies and procedures*. [NHS Lothian Safe Use of Medicines Policy](#), [Safe Use of Medicines – Policy Online \(nhsllothian.scot\)](#), which contains a specific procedure outlining the requirements for [Practitioners authorised to administer medicines \(nhsllothian.scot\)](#).

The following checklist is designed for professional leads and managers of registered healthcare professionals, to ensure appropriate medicines governance, training, competency assessments and approvals are in place before any registered professional administers a medicine.

Medicines policy subcommittee will not review every case individually, but the committee are available for advice if required.

There is a separate approval process and checklist for non-registered staff. All administration of medicines by non-registered professionals requires appropriate approvals. Contact [jenny.scott@nhs.scot](mailto:jenny.scott@nhs.scot) for advice.

## 1. Checklist

Refer to the explanatory notes below when completing this checklist.

Checklist for administration of medicines by registered healthcare professionals.			
Criteria to consider.	Y/N	Description	Additional notes
1. Profession of person (s)			
2. Statutory regulatory body			If there is no statutory regulatory body, for the staff group being considered for medicines administration then refer to the process for non-registered staff.
3. Is medicines administration clearly defined and supported as a potential role by the regulatory and professional body of the registered healthcare professional. Is there national guidance?			
4. Does NHS Lothian safe use of medicines policy and procedures cover administration of the medicine by this registered profession?			<a href="https://www.nhs.uk/lothian/medicines/policies-and-procedures/practitioners-authorized-to-administer-medicines/">Practitioners authorised to administer medicines (nhslothian.scot)</a> .
5. Are the circumstances for the administration of the medicine(s) clearly defined?			
6. Why does the medicine require to be administered by this registered healthcare professional group?			
7. Is medicines management clearly defined in the registered professionals' job description?			

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Criteria to consider.	Y/N	Description	Additional notes
8. What legal prescription allows administration of the medicine? E.G., <ul style="list-style-type: none"> <li>○ Prescribed by prescriber on medicine chart.</li> <li>○ Patient group direction</li> <li>○ Patient specific direction</li> <li>○ Other</li> </ul>			
9. Where will administration of the medicine be documented?			
10. Is the registered professional familiar with the medicine (s) they are administering?			
11. Is the appropriate medicines governance approval in place.			
12. Has the registered professional had medicines administration training?			
13. Has the registered professional had medicines management training?			
14. Are medicines administration competency assessments in place.			

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Criteria to consider.	Y/N	Description	Additional notes
<p>15. Has medicines administration by the registered professional been agreed by the clinical team in charge of the clinical area and patient speciality?</p> <p>Is there a clear route of escalation if there are any concerns regarding medicines administration or the patient.</p>			
16. Assessment by registered professional's Professional lead /line manager		Summary of assessment:	
<p>Name:</p> <p>Designation:</p> <p>Signature and date:</p>			

## 2. Explanatory notes

### 1. Profession of person

E.G. Pharmacist, physiotherapist, podiatrist, dietician, radiographer.

### 2. Registered professionals

A **registered profession** is a term which is defined in the [Professional Qualifications Act 2022 - Parliamentary Bills - UK Parliament](#). It means a profession which is regulated by law in the UK or a part of the UK. The bill sets out that a profession is regulated by law where there is a legal requirement to have certain qualifications or experience (or meet an alternative condition or requirement) to undertake certain professional activities or use a protected title.

The statutory regulatory body carries out a range of functions in relation to the professions they regulate, including making sure individuals have the necessary qualifications and/or experience to practise the profession and taking any necessary enforcement action. This is different from the professional body which does not necessarily mean that a person possesses qualifications in the subject area, nor that they are legally able to practice their profession.

**If there is no statutory regulatory body, for the staff group being considered for medicines administration then refer to the process for non-registered staff.**

### 3. Is medicines administration clearly defined as a potential role in the regulatory or professional body of the registered professional.

Regulatory and professional bodies will provide clear advice regarding medicines. For example, the Health and Care Professions Council provide advice for several professional groups. [medicines-entitlements-of-our-registered-professions.pdf](#). Some registered healthcare professionals are not supported to administer medicines, e.g., dental nurses. Some professions are legally authorised to sell, supply, and administer certain medicines, e.g., chiropodists, podiatrists, orthoptists, paramedics. [Sale, supply and administration](#)

### 4. Does NHS Lothian safe use of medicines policy and procedures cover administration of the medicine by this profession?

Whilst a person may be legally authorised to administer a medicine, this may be restricted by NHS Lothian medicines governance procedures.

This information is summarised in the procedure [Practitioners authorised to administer medicines \(nhslothian.scot\)](#)

Note there are also certain restrictions to medicines administration depending on the medicine type, formulation, and route and a second registered professional witness is enforced for some medicines.

**5. Are the circumstances for the administration of the medicine(s) clearly defined?**

Administration should usually be confined to a short list of medicines which are within the professional's scope of practice for specific indications in a specific clinical area. E.G. Triamcinolone joint injections by physiotherapists using PGDs or prescribing qualification in an orthopaedic clinic.

**6. Why does the medicine require to be administered by this registered healthcare professional group?**

Why are nurses not administering the medicine? E.G. Podiatrist administering a medicine as part of a treatment procedure.

**7. Is medicines management clearly defined in the registered professionals NHS Lothian job description?**

This is required for vicarious liability.

**8. What legal prescription allows administration of the medicine?**

**9. Where will administration of the medicine be documented?**

- Prescribed by prescriber on medicine chart. Will a prescriber be available to prescribe the medicine in a timely manner.  
*Wherever possible, the actions of prescribing, dispensing/supply/administration should be performed by separate healthcare professionals.*  
*Where a risk assessment is performed and in place and it is in the best interests of the patient, the same registered professional can be responsible for dispensing, supply, and administration of medicines.* [Prescribing and dispensing position statement guidance](#)
- NHS Lothian patient group direction (PGD). Ensure PGD processes are followed, [Patient Group Directions](#)  
*Is the registered professional legally allowed to administer medicines via a PGD?*  
[How to develop a Patient Group Direction – SPS - Specialist Pharmacy Service – The first stop for professional medicines advice](#)
- NHS Lothian patient specific direction. Ensure PSD processes are followed.
- Some registered professions have legal exemptions to supply and administer certain medicines [Sale, supply and administration](#)  
Any processes followed must still comply with NHS Lothian [Safe Use of Medicines – Policy Online](#), [NHS Lothian Safe Use of Medicines Procedure](#)

- Documentation of medicines prescription and administration in the paper or electronic clinical notes may be approved in some circumstances.

Only **one** main prescription and administration record should be in use for each patient during individual hospital stays or outpatient appointments. Where specific therapy is prescribed on an approved supplementary chart, it should also be documented on the main chart. [Prescribing in hospitals and NHS Lothian healthcare premises Procedure.pdf](#).

Where possible currently available and approved paper or electronic medicine charts should be used. Bespoke medicine charts require medicines governance approval via NHS Lothian medicines policy subcommittee or the appropriate drug and therapeutics committee.

Access may need to be approved and arranged for the NHS Lothian Hospital Electronic prescribing and medicines administration (HEPMA) systems.

**10. Is the registered professional familiar with the medicine (s) they are administering?**

Knowledge of medicine, indications, doses, adverse effects, interactions, contraindications etc. [BNF \(British National Formulary\) | NICE](#) , [Home - electronic medicines compendium \(emc\)](#).

**11. Is the appropriate medicines governance approval in place.**

- Ensure that the medicine being administered is approved for use for the appropriate indication in NHS Lothian, e.g. [Formulary | East Region Formulary](#).
- Ensure you are approved in NHS Lothian to administer medicines and the medicines governance requirements for the medicine formulation or route are being met [Practitioners authorised to administer medicines \(nhslothian.scot\)](#).

**12. Has the registered professional had medicines administration training and competency assessments as required?**

**13. Has the professional had medicines management training?**

- Statutory regulatory and professional bodies may provide medicines administration and medicines management training. E.G. there are specific training qualifications for intra-articular joint injections by physiotherapists, but NHS Lothian medicines governance processes must also be followed. E.G. PGD, medicine administration and documentation, medicine ordering procedures.
- All NHS Lothian staff administering medicines must have medicines administration training and competency assessments. There may be NHS Lothian medicines administration courses already available, but attendance would need to be agreed with Clinical Nurse

Education and other course owners. In some cases, bespoke training may be available or require to be developed within the professional group.

- Staff should be familiar with the Safe Use of Medicines Policy and procedures. [Safe Use of Medicines – Policy Online](#), [NHS Lothian Safe Use of Medicines Procedures](#). If using PSD or PGD then requirements for using these must also be followed. [Patient Group Directions](#)
- Operational managers and professional leads should review NHS Lothian medicines policy and procedures to ensure relevant medicines governance procedures are part of the training and competency assessments completed by staff.

#### **14. Competency assessments**

Training and competency assessments must be completed by those administering medicines. Certain medicines have strict training and competency assessment criteria that must be completed [Practitioners authorised to administer medicines \(nhslothian.scot\)](#). Staff administering medicines must be aware that regular updates are required for some practices, e.g. administration of intravenous medicines requires a 2 yearly revalidation.

#### **15. Has medicines administration by the registered professional been agreed by the clinical team in charge of the clinical area and patient speciality?**

**Is there a clear route of escalation if there are any concerns regarding medicines administration or the patient.**

The nurse or registered practitioner in charge of the ward, theatre, or other clinical area where the medicines are administered, must agree to medicines administration by the registered professional. The clinical lead for the registered professional must ensure there is a written protocol in place defining the circumstances and the persons authorised to administer medicines. They must also ensure that the registered professionals concerned have been trained and assessed as competent and an ongoing competency assessment process is in place. The registered professional is responsible for working within their scope of practice.

There must be a clear route of escalation if there are any concerns in relation to the medicines administration process.



### 3. Associated materials

1. [NHS Lothian Safe Use of Medicines Procedures](#)
2. [Safe Use of Medicines – Policy Online \(nhslothian.scot\)](#)
3. [Practitioners authorised to administer medicines \(nhslothian.scot\)](#)
4. [Professional Qualifications Act 2022 - Parliamentary Bills - UK Parliament](#)
5. [Medicines-entitlements-of-our-registered-professions.pdf](#)
6. [Sale, supply and administration](#)
7. [Prescribing and dispensing position statement guidance](#)
8. [Patient Group Directions](#)
9. [How to develop a Patient Group Direction – SPS - Specialist Pharmacy Service – The first stop for professional medicines advice](#)