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**Royal College of Occupational Therapists Submission to changes to Human Medicine Regulations to support the rollout of COVID-19 vaccines**

This submission is made on behalf of the Royal College of Occupational Therapists (RCOT), the professional body for occupational therapists across the UK.

The submission is made in response to consultation on changes to Human Medicine Regulations to support the rollout of COVID-19 vaccines inquiry. Further information on any aspect of this response can be gained by contacting the College.

**Submission**

**In general the Royal College of Occupational Therapists is supportive of the policy objective around ensuring there is the available workforce to administer the COVID-19 vaccine and influenza vaccines. The feedback in this response will centre on section 3 of the consultation, as we believe that for reasons detailed below, occupational therapists are well placed to support this.**

Occupational therapists are one of the health and care professionals legally entitled to administer and supply medicines using Patient Group Directions (PGDs), and this is being used in a number of practice areas. Our members work in a wide range of health, social care and occupational health settings and clinical specialities. These include, stroke, musculoskeletal, pain clinics, burns and plastics, rheumatology, hand injuries and mental health. RCOT is aware of services where PGDs are being used by occupational therapists for oral antibiotics, analgesics, anti-inflammatories and antihistamines. Occupational therapists also work in a range of locations including emergency departments, minor injuries units, occupational therapist-led wards and review clinics, and community teams (both physical rehabilitation and mental health).

**Response to the three amendments to The Human Medicine Regulations.**

The College is supportive of extending the scope of PGDs, and we believe that there are a number of practitioners already with the expertise to administer vaccinations. The College, also, welcomes the additional suggested delivery routes via a national protocol and occupational health schemes. Given the scale of vaccinations needed the College feels it is important to have a wider workforce with the necessary skills to administer vaccines. This could help lesson further impact on existing service provision already severely impacted by COVID-19 restrictions

At the heart of occupational therapy is the belief that the ability to participate in daily activities (occupations) is fundamental to health and wellbeing, and that occupation in itself has therapeutic value. Given the restrictions that COVID-19 continues to have on peoples’ ability to work, complete leisure pursuits and socialise, the College recognises that a vaccination programme will allow society and individuals to resume normal occupations and routines.

The plans for an approved training programme are of key importance and we are keen to see the details. As a professional body we need to reassure our members that the training will be robust, with clear competency assurance, with ongoing advice and guidance in place once rollout begins. For occupational therapists that are new to administering vaccinations, it is vital that there are clear assurances nationally and employers can demonstrate they are covered legally under local insurance schemes to undertake this additional task.

Given the scale of the vaccination work, there needs to be clear and uniform guidance on how vaccination rollout will be dealt with in local areas. With regard to PGD extension we would urge you to consult the Specialist Pharmacy Service, in particular their guidance on Patient Group Direction (PGD) use in a service provided by multiple organisations. <https://www.sps.nhs.uk/articles/patient-group-direction-pgd-use-in-a-service-provided-by-multiple-organisations/>

Consideration must, also, be given to the potential impact that these extra responsibilities will have on existing service provision. The restrictions and redeployments related to the pandemic have already placed significant pressures on occupational therapists’ ability to deliver rehabilitation and therapy services. The pressures on these services need to be considered carefully in any workforce redeployment.

**Summary**

In summary, the College is broadly supportive of amendments to the legislation to enhance the workforce. As the professional body for occupational therapists in the UK, we would welcome further consultation on how the legislation once passed will be delivered. This will enable us to support and address our member’s concerns on scope of practice and in relation to legal, insurance and training issues.

**About the College**

The Royal College of Occupational Therapists (RCOT) is pleased to provide a response to this inquiry. RCOT is the professional body for occupational therapists and represents over 33,000 occupational therapists, support workers and students from across the United Kingdom. Occupational therapists work in the NHS, Local Authority social care services, housing, schools, prisons, care homes, voluntary and independent sectors, and vocational and employment rehabilitation services.

**Contact**

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