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Professor Sir Munir Pirmohamed
Commission on Human Medicines

Dear Professor Sir Munir Pirmohamed,

I am writing on behalf of the College of Mental Health Pharmacy (CMHP) to express our disappointment that specialist pharmacists were not included in the suggested list of healthcare professionals authorised to act as second signatories for the prescribing of valproate to individuals under the age of 55.

We believe that the exclusion of pharmacists from this list fails to recognise the valuable contributions pharmacists have made to the safe and effective prescribing of valproate, particularly since the inception of the Pregnancy Prevention Programme (PPP). Whilst we recognise that the list is a suggested one and could be extended to include specialist pharmacists at a local level, we are disappointed as a profession that pharmacists, as experts in the use of medicines, would not be named alongside nurses and doctors.

Pharmacists play a pivotal role in ensuring the safe and effective use of medications, and their expertise extends far beyond the dispensing of prescriptions. As part of the multidisciplinary team, they challenge unsafe, inappropriate prescribing and highlight monitoring requirements where necessary. Consultant psychiatrists and other prescribers are often reliant on the pharmacist to provide an expert opinion to ensure that any prescribing they undertake is individualised and safe. CMHP firmly asserts that the specialised knowledge and skills possessed by pharmacists uniquely qualify them to undertake the responsibility of a second signatory.

Many pharmacists are in advanced roles, such as Advanced Clinical Practitioners (ACPs), there are increasing numbers of consultant pharmacists, and by 2026, all pharmacists will leave university as independent prescribers. Pharmacists in mental health are also statutory consultees for Second Opinion Approved Doctors (SOADs) for patients who have been detained under the Mental Health Act 1983 for longer than 3 months. Pharmacists will discuss the treatment regimen with the SOAD and provide a specialist opinion for them to consider.

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These roles signify a high level of expertise, training, and responsibility in managing medication therapies for complex conditions, including mental health disorders. Pharmacists, through these roles, have demonstrated their ability to work collaboratively with other healthcare professionals to provide comprehensive and patient-centered care.

Pharmacists are well-versed in assessing the risks and benefits of medications and contribute valuable insights to the prescribing decision-making process. Pharmacists have been leading on training other healthcare professionals on the PPP as well as undertaking audits and leading research in this area.

We ask that the Commission on Human Medicines add specialist pharmacists to the list of suggested professionals who can act as second signatories and recognise pharmacists as integral members of the healthcare team.

CMHP would also welcome the opportunity to comment on any draft proposals involving medicines used for mental health conditions before they are published.

Thank you for considering our concerns, and we would welcome the opportunity to engage in further discussions on this matter.

Yours sincerely,

Karen Shuker
CMHP President