

CQC position on the Epilepsy Nurse Association



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To [redacted]@cqc.org.uk, [redacted]@cqc.org.uk and 3 others

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Dear Colleagues,

I am contacting you about the Epilepsy Nurse Association (ESNA) guidelines for the administration of buccal midazolam. These guidelines adopt a 'train the trainer' model for administering rescue medication i.e. they do not follow the requirements associated with registered nurse delegation.

The 2019 ESNA guidelines were endorsed by the Royal College of Psychiatrists and although the guidelines refer to the RCN being given an opportunity to comment (pg.16), I have been advised by the RCN that the guidelines do not have an RCN endorsement. In the past, I have had email communication with [redacted] who shared my concerns about the approach taken in the ESNA guidelines.

The CQC website refers to making sure the quality of training for rescue medication meets the ESNA guidelines (<https://www.cqc.org.uk/guidance-providers/adult-social-care/medicines-seizures>). And yet, on another webpage, the CQC is clear about registered nurse delegation and the requirements set by the NMC (<https://www.cqc.org.uk/guidance-providers/adult-social-care/delegating-medicines-administration>). This information appears to be conflicting.

My understanding is that the administration of prescribed medication to manage medical conditions is not within the scope of first aid (<https://www.hse.gov.uk/pubns/priced/l74.pdf> para. 42/43) and this intervention should be a clinical task that a registered nurse should delegate.

Therefore, I would be grateful if you could clarify the CQC's position on the ESNA guidelines,

many thanks,  
Emma Smith (LLM, MSc, MBPsS)

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