

Response from the Royal College of Pathologists to consultation on proposals for draft EU guidelines on the prudent use of antimicrobials in human medicine

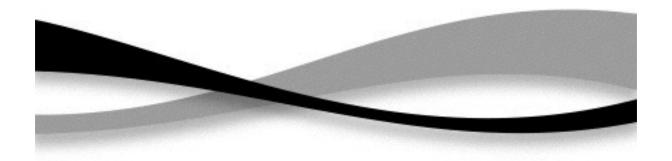
The Royal College of Pathologists' written submission

August 2016

For more information please contact: Rachael Liebmann Registrar

The Royal College of Pathologists 4<sup>th</sup> Floor 21 Prescot Street London E1 8BB

Phone: 020 7451 6700 Email: registrar@rcpath.org Website: www.rcpath



## 1 About the Royal College of Pathologists

- 1.1 The Royal College of Pathologists (RCPath) is a professional membership organisation with charitable status. It is committed to setting and maintaining professional standards and to promoting excellence in the teaching and practice of pathology. Pathology is the science at the heart of modern medicine and is involved in 70 per cent of all diagnoses made within the National Health Service. The College aims to advance the science and practice of pathology, to provide public education, to promote research in pathology and to disseminate the results. We have over 10,000 members across 19 specialties working in hospital laboratories, universities and industry worldwide to diagnose, treat and prevent illness.
- **1.2** The Royal College of Pathologists response reflects the position of the Royal College of Pathologists formulated by Dr Prema Singh, Medical Microbiology Specialty Advisory Committee chair, with input from the members of the Committee.

## **2 CONTENTS**

Section of document (Introduction, Definitions, etc)	Page and line number	Comment and rationale	Proposed change
3bii	3, 126	In order to truly establish a sensible antibiotic stewardship programme which includes guidelines based on local epidemiology, the microbiology laboratory has to be part of this antimicrobial stewardship team. In many countries the specialist Microbiologists are in fact leading the stewardship teams.	Change to:  An antimicrobial stewardship team including at least a clinician (iii), a clinical Microbiologist (iv) and a pharmacist (v).  Add amongst the recommendations the description of such a specialist:  A microbiologist with expertise in providing advice on infection management

Section of document (Introduction, Definitions, etc)	Page and line number	Comment and rationale	Proposed change
3biii	3, 127	In many hospitals the stewardship team is in fact led by a physician/clinician specialised in clinical microbiology	Change (shorten) 3 biii to: A clinician with expertise in the management of infection.  Add amongst the recommendations in 3 b  A physician who is professionally involved in diagnosis, prevention and treatment of infectious diseases should be responsible for the antimicarchial atomorphis to an
4	4, 156-165	The role and responsibility of the clinical microbiologist is not documented in this draft proposal.  it is the specialists working in microbiology laboratories who hold roles and responsibilities and draw up and assess compliance with guidelines	Change title to: Clinical Microbiologists in microbiology laboratories  Change text to: Clinical Microbiologists play a key role in providing diagnostic information and the expertise required to exercise effective infection control, prevention of antimicrobial resistance and adequate treatment of infection. Furthermore they provide advice and guidance on optimal diagnostic strategies for infections. Current evidence and expert opinion support the following as effective elements of guidelines to be initiated by clinical microbiologists and to be implemented at the laboratory level.  Add the following responsibilities  d. be available to clinicians for advice on diagnosis and treatment of difficult to treat infections.  e. Communicate occurrence of nosocomial  (health care associated) outbreaks of infection to the relevant Commissioners/authorities and where applicable actively assist in the management of such outbreaks.