Nursing and Midwifery Council
23 Portland Place
London
W1B 1PZ

9 May 2019

Dear Sir/Madam,

As an employers’ organisation for the NHS within England, NHS Employers welcomes the opportunity to provide a response to the Nursing and Midwifery Council’s consultation on the draft standards of proficiency and pre-registration education programmes for midwives.

Our response outlines potential workforce challenges around proposals to extend education programmes from three to four years, and also some of the positive action that employers are currently working through to ensure midwives feel competent, confident and supported to deliver high quality, safe, compassionate care to service users.

Our approach

This response has been compiled following extensive engagement with employer organisations across the NHS within England. Engagement included delivering a webinar in conjunction with KPMG in November 2018 with input from colleagues across HR, education and the nursing and midwifery professions. It also includes input from our regional HR networks, Workforce Supply Reference Group (which includes a group of employers who provide strategic input on emerging workforce issues) and have sought input from our Policy Board to provide a governance view.

We have also had direct calls with both heads of midwifery and HR professionals within nineteen NHS trusts across the country, to gain a greater understanding of current good practice which may be useful to consider in its consultation on pre-registration requirements and to inform any future discussions about what additional work might need to be considered to develop the preceptorship offer post-registration.

In addition to this engagement activity, we have raised awareness about the consultation through our scheduled communication channels through our website, social media and bulletins, encouraging individual organisations to respond to the NMC directly.
1. **Key points**

1.1 There is a strong commitment from employers to ensure they have a workforce which can deliver high standards of safe and compassionate patient care. Health and Care is rapidly changing so it will be critical that education frameworks are able to keep up with the pace of change to ensure NQMs are equipped with the foundations and skills to enable them to carry out the duties required of them when they enter clinical practice.

1.2 While employers agree with the NMCs priority around giving students time to reflect on their knowledge and how this can be applied to clinical practice, we remain unconvinced that extending the period of academia would be the most effective approach in supporting them to become more ‘work ready’.

1.3 We strongly believe that the level of competence outlined by the draft standards can be appropriately delivered within the existing three year/4600 hours education programme and would advocate that this is not changed.

2. **Employer views on core areas**

2.1 **Extended programme**

2.1.2 We would have significant concerns about the impact of having a fallow year would have on the workforce supply pipeline [especially in more remote parts of the country], when there are aspirations to expand the number of midwives in training.

Employers are already under considerable pressure to scale up supported learning in the workplace, through expanded nurse training numbers, the introduction and scale up of nursing associates and the ongoing increase in apprenticeships across all settings.

2.1.3 A four-year programme will also result in students paying more for an additional year’s tuition which may have a negative impact on making midwifery attractive to certain individuals, especially more mature students with established financial commitments.

2.1.4 Any decrease in the number of NQMs coming onto the NMC register and entering the workforce may also escalate challenges around managing attrition rates, resulting in an increasing reliance on agency/bank cover to backfill vacancies which will have a significant cost implication for employers.

2.2 **Standards of proficiency**

2.2.1 Most employers felt that the five domains within the Standards of Proficiency would adequately provide a sound knowledge of the skills, knowledge and levels of experience required of NQM’s and in ensuring they can provide high quality and compassionate care to mothers and their new born infants with a variety of complex needs.
2.3 Pre-registration: education standards

2.3.1 While employers largely agree that current education programmes will help to provide many of the skills by midwifery services now, they are concerned that the pace of development may mean they become outdated relatively quickly. Though not suggesting this would require a radical overhaul every few years, employers would not want education programmes and proficiencies to become ‘static’ to ensure they remain ‘future proof’.

2.3.2 How educators deliver education programmes varies across the country, especially in regard to training around the handling of complex cases. While employers would support the need for education programmes to remain flexible enough to go over and above what’s required in the Standards, they would welcome the NMC considering the inclusion of new born and infant physical examinations (NIPE) in the Standards to ensure this is applied more consistently. We are aware that certain universities across the country such as Hull already offer this training and that this can be elected by employers as part of the current three-year education programme, so this would not necessarily require any extension to the pre-existing programme length.

2.3.3 Although continuity of care features heavily in Domain 2 in the Standards of Proficiency, this is not heavily featured in the pre-registration education standards. Employers would find it helpful for the NMC to consider giving greater emphasis to the importance of continuity of care as well as the specific skills and knowledge that needs to be gained and applied as part of the education programme.

2.3.4 Employers welcome the shift towards enabling signoff of the competencies of newly qualified midwives by wider healthcare professionals and recognise how this may help to widen the range of placements that can be offered and in building multi-disciplinary teams. For example, we know that some NHS trusts have recognised significant benefits in assuring competence and confidence of NQM’s who work alongside paediatricians to share learning and experience.

2.4 Post registration: preceptorship

2.4.1 We are aware of the NMC’s interest in what currently happens post-registration to support NQM’s coming into clinical practice for the first time, with a view to looking at whether there is a need to make recommendations to legislate preceptorships.

2.4.2 There is a strong view amongst employers that the NMC’s role is around creating the standards at the point of registration and as part of revalidation. Once the student qualifies as a newly qualified midwife, the responsibility for preceptorship firmly sits with employers. We would therefore be keen to ensure that any change to the preceptorship approach is led at an employer/STP/ICT and national level.

2.4.3 Most NHS trusts already have preceptorship programmes in place however, the approach to preceptorship varies across the country. Some NHS trusts have reduced their preceptorship programmes to six months which has made it a competitive market as NQM’s are more likely to want to do a shorter preceptorship programme to
reach a band six sooner. Employers acknowledge that there are significant benefits in ensuring a more consistent application of preceptorship packages and there is strong support to explore how they can improve and align the level and quality of support provided NQMs during their first period of employment as a registered midwife. We are aware that NHS trusts within London, West Yorkshire and the North West are already working in partnership to align the preceptorship offer to ensure greater consistency in approach across their respective regions.

2.4.4 NHS Employers is part of a steering group led by Health Education England (HEE) as part of their RePAIR programme. As part of this strand of work, we are working with the Chief Midwifery Officer for England, professional leads within HEE and the Department of Health and Social Care (DHSC) to look at what needs to be developed in partnership as part of a revised preceptorship framework with a view to publishing revised guidance. The guidance, which is intended to be published to coincide with the introduction of the NMC’s new standards, will outline what employers need to consider to assure the quality of their preceptorship offer. We will continue to work in partnership across our respective networks to share good practice with a view to driving a more consistent approach across the country.

2.5 Format and lay-out of the Standards

2.5.1 It was generally felt that the way the standards have been laid out, has led to over duplication across the domains and fields of practise in relation to what knowledge, skills and experience NQM’s will need to be able to evidence in order to meet these requirements. It was also felt that the volume of prescriptive information explaining what is expected of NQM’s at the point of registration has made them slightly unwieldy and therefore difficult to clearly identify what has changed, been added or removed when mapping these across pre-existing standards.

Formatting the documents in this way has also led to comments about certain elements being omitted from the pre-registration standards, such as foundation training in non-medical prescribing, which is in a separate document. It will be important for references to be clearly linked to avoid any important information being missed.

In reviewing how the Standards are written, the NMC may wish to further consider these points.

3. Implementation

4.1 The draft standards have significant implications for employers and educators to consider and implement. NHS Employers is keen to support the NMC with facilitating any engagement with employers as things progress. This will be critical to ensure any changes are widely understood and considered by employers and we can support the timely implementation of any new requirements.
4.2 We appreciate that there are other considerations, such as the direction of change as the UK prepares to leave the EU and other political and legislative changes which may have an impact or bearing on how professional regulators set the standards for practitioners on their registers, and these will need to be carefully considered by the NMC. Again, we would be keen to ensure we continue the dialogue with the NMC to ensure we remain on the front foot in regard to understanding any implications for workforce practice and supply.

5. Contact for further information

5.1 If you would like to discuss the content of this response further, or you require any clarification on the points raised, please contact nyla.cooper@nhsemployers.org

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