

2 Brewery Wharf
Kendell Street
Leeds LS10 1JR
Tel 0113 306 3000

www.nhsemployers.org

Nursing and Midwifery Council

23 Portland Place
London W1B 1PZ

16 November 2018

Dear Sir/Madam,

NHS Employers is pleased to provide a response to the Nursing and Midwifery Council (NMC) consultation on the proposed arrangements for nurses and midwives returning to practice on behalf of employers in the NHS in England. We fully support the intention to make the return to the register as straightforward as possible.

Our feedback highlights the view from employers that new arrangements for individuals re-joining the register need to support individuals who wish to return to the register.

The number of vacancies for registered nurses remains a large concern for all employers, whether NHS, independent health sector or social care. Even with all the proactive action around attraction and retention in the profession, the situation is unlikely to improve in the short to medium term. However, it is critical that any changes to registration processes and education standards take account of the need for public protection to be upheld, and enable individuals with the relevant and appropriate skills, experience and qualifications to enter or re-enter the register at pace.

There are a range of factors which impact on the success and viability of return to practice programmes. Not all of these are within the remit of the regulator. In this response we have only included the issues which the NMC can directly affect through the standards and registration process.

However, we wish to note that there are clearly issues in the way education providers interpret NMC requirements and this variation of the standards in practice adds frustration and confusion, with both individuals looking to return to the register and employers wanting to support individuals. Anything that the NMC can do to reduce the confusion would be welcomed by employers.

Factors critical to success of return to practice:

- Empower the registrant
- Flexibility in delivery of the programme: some people will require more time to refresh skills and build confidence than others
- Clear information available to potential returners about the regulatory requirements they need to meet and how these can be evidenced
- Clear information for employers.

Test of competence

We are particularly concerned about the suggestion within the consultation to introduce a test of competence as a method for re-entering the register.

We know there is a precedent set for this type of approach with the OSCE which has been developed for non-EEA trained nurses to enter the register. However, we have serious reservations as to whether this is the direction of travel which should be pursued without an evidence base, evaluation of impact against objectives and a full understanding of the consequences and implications of introducing an additional entry test to the register.

The current review of the overseas route may provide some insight into whether the OSCE route is effective in delivering the desired outcome. We would also support looking at whether there are alternative methods which could be used to reach the same outcome.

We suggest and recommend that introducing a test of competence should be the content of a separate and full engagement and consultation process.

Other options for assessing RTP

Employers are keen to explore the feasibility of an employer-led approach to facilitating and assessing return to practice. We would like to discuss this further with NMC colleagues as the team progress this review of return of practice.

Final comments

Employers do not wish to see any compromise in quality and standards, but we are very clear that if as a sector we want to support and encourage nurses to re-enter the register and the workplace as a nurse, we need to create the correct conditions to support that return. The requirements for delivering the placement and training programme is a major component and an important one to get right.

If you would like to discuss the content of this response further, please contact Adele Bunch at adele.bunch@nhsemployers.org.

Kind regards
Caroline Waterfield
Assistant Director
Development and Employment, NHS Employers