

Health Education and Improvement Wales (HEIW)
Tŷ Dysgu
Cefn Coed
Nantgarw
CF15 7QQ

12 May 2023

By email heiw@wales.nhs.uk

Dear Sir/Madam,

Draft framework for Enhanced, Advanced and Consultant Clinical Practice in Wales consultation response

We welcome the opportunity to comment on Health Education and Improvement Wales's (HEIW's) draft Professional Framework for Enhanced, Advanced and Consultant Clinical Practice.

What we do as a regulator

As a four country regulator, our purpose is to promote and uphold the highest professional standards in nursing and midwifery in order to protect the public and inspire confidence in the professions. Our vision is safe, effective and kind nursing and midwifery that improves everyone's health and wellbeing. As the professional regulator of almost 771,000 nursing and midwifery professionals, we have an important role to play in making this a reality.

Our core role is to **regulate**. First, we promote high education and professional standards for nurses and midwives across the UK, and nursing associates in England. Those standards apply no matter where people work – in a hospital, in social care, in the community, in public health, in education or elsewhere. Second, we maintain the register of professionals eligible to practise. Third, we investigate concerns about nurses, midwives and nursing associates – something that affects less than one percent of professionals each year. We determine whether their skills, knowledge, education or behaviour fall below the standards needed to deliver safe, effective and kind care. We believe in giving professionals the chance to address concerns, and support employers taking local action where appropriate. However, we'll always take action when needed, including removing people from our register in the most serious cases.

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We're the independent regulator for nurses and midwives in the UK, and nursing associates in England. Our vision is safe, effective and kind nursing and midwifery practice that improves everyone's health and wellbeing.

Registered charity in England and Wales (1091434) and in Scotland (SC038362)

To regulate well, we **support** our professionals and the public. Regulating and supporting our professionals allows us to **influence** health and social care.

We share intelligence from our regulatory activities and work with our partners to support workforce planning and sector-wide decision making. We use our voice to speak up for a healthy and inclusive working environment for our professions.

The safety and protection of people who use health and care services is at the heart of our [Corporate Strategy 2020-25](#). Our strategy sets out our vision and purpose for these five years. In this Strategy we committed to:

- a) delivering a new set of ambitious post-registration standards of proficiency for community and public health nurses, and
- b) carrying out a comprehensive review of advanced nursing and midwifery practice, including consideration of whether regulation is needed.

Review of whether to regulate Advanced Practice

As a regulator, we recognise that the role of advanced practice in nursing and midwifery in the UK is transforming and that consideration of future additional regulation of advanced practice roles is important, hence why it is a commitment set out in our current Corporate Strategy.

More information can be found in our [Council papers – 17 May 2023](#) (at agenda item 8) and some independently commissioned research conducted by the [Nuffield Trust](#) to feed into our review.

Draft framework comments

As a four country regulator of nursing and midwifery professionals, it is useful for us to consider the approach to enhanced, advanced and consultant clinical practice adopted by Wales, and how this informs our comparative analysis of the four country strategic context and position in relation to the standards of proficiency we set for nurses and midwives, and in the post registration specialist standards we set and to support the work we are doing in advanced practice.

It is positive to note that following the review of the framework published in 2010, the new framework now reflects the changing landscape in clinical practice, such as changes to health needs across the population, increased multi-disciplinary work, changes to inter-professional learning, and increased service demand across sectors.

We have some particular observations below in response to the consultation questions.

- We noted that the **'title'** of the framework does not specify which professions it is designed for, rather it is intended to support three distinct levels of practice (enhanced, advanced and consultant) across the spectrum of health and care professions, with the exclusion of medical doctors and dentists. For clarity, it may be helpful to set out the list of professions it does apply to, for instance that it can be applied to midwifery professionals as well as nursing professionals.

Additionally, it would be helpful to clarify if this framework will apply to medical associates who will soon be regulated by the GMC?

- In terms of '**purpose**', we note the framework is intended to be used by employers and individual healthcare practitioners and trainees to meet workforce priorities designed to improve quality of care, and is to be used across different health and care settings. We believe this flexibility in application of the framework will support person centred care and more effective service delivery.
- In terms of '**governance**', we note the framework is designed to standardise the levels of professional practice across Wales for all health and care professions, with the exclusion of medical doctors and dentists, support employers expectations of enhanced, advanced and consultant practitioners and understanding of roles at each level, and provide assurance in their underpinning educational attainment. We note that the framework is supported by the four pillars often referred to in advanced practice (clinical, management and leadership, research and audit and education). It is positive to note that the framework has the flexibility to support both current and future role development across health and care professions, and this element of being future focussed is a principle we embedded into our suite of education and programme standards.
- We also welcome that the framework's aim to enhance health and care practitioners' capabilities to effectively utilise their knowledge and skills to support and lead healthcare teams, as well as the underpinning emphasis on collaboration and partnership working across professional groups. We recognise the value of our professionals working in multi-disciplinary teams that help to provide seamless person-centred care, supporting autonomous decision making across these levels of practice, and note how this framework which extends across professions successfully supports this.
- We support the framework's objective of emphasising the importance of clearly defining roles, ensuring consistency at each intended level of clinical practice and improved governance (such as consistency within reporting structures, improved accountability and suitable job evaluation of roles), which can help people who use services to better understand and identify who is supporting and caring for them. It can support professionals to continue to practise safely and effectively in specific roles which in turn enhances the safeguarding and service delivery for people using those services.
- We note there are some tangible benefits derived from the proposals within the framework as set out as below;
 - For employers to keep records of professions, level of practice and job role, to enable accurate data collection- we noted this is a positive step in bridging understanding of how many enhanced, advanced and consultant practitioners are employed in different settings and in recognising their respective scopes of practice, as this is currently an area that lacks data and understanding.
 - To create advanced practitioner forums to facilitate collaboration, effective networking and dissemination of best practice- we believe this will support more

- effective teamworking that benefits the people in their care, and has the potential to improve professionals' wellbeing and personal and professional development.
- For employers to appoint leads for advanced practice who will report to board level, an example being nurses - our [Standards of proficiency for registered nurses](#) set out our core expectations that nurses co-ordinate care that is compassionate, evidence-based, and person-centred, leading and managing teams and service provision, therefore this specific role as an advanced practice lead both signals, and further enhances and strengthens their leadership capability and position to influence decision-making and create a positive impact on the care of people.
 - We note that in the framework at page 12, it states how the three levels of practice “reflects a set of responsibilities, competencies and capabilities...and that such practitioners are always accountable to their regulatory body whatever the level or context of practice”. All nursing and midwifery professionals must uphold the standards and behaviours set out in our [Code](#) (updated 2018) and in line with their scope of practice, so that people can have confidence that they will consistently receive quality, safe care wherever they are treated. They must also work within limits of their competence and have [appropriate indemnity cover](#) for their scope of practice (standard 12 of our Code).

We view the framework as being a supportive tool for continuous professional development (CPD) and reflective practice, for those working in enhanced, advanced and consultant clinical practice roles and can further be helpful for our nursing and midwifery professionals undertaking revalidation of their registration every three years. Our [revalidation process](#) helps make sure they keep developing their knowledge and expertise, to maintain excellent standards of practice throughout their careers.

We note that the framework has been developed through extensive engagement with specific stakeholders and we would like to extend our willingness to participate in any further engagement you may have going forward.

Thank you for this opportunity to feedback and hope these observations are helpful.

Yours sincerely



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Annex A

Strategic programme of change for nursing and midwifery education

The NMC developed and rolled out a strategic programme of change for education for nurses and midwives.

In 2018 we published new [standards of proficiency for registered nurses](#) and these are organised under seven headings, and were designed to ensure that across all four fields of nursing practice, registered nurses are able to meet the person-centred, holistic care needs of the people they encounter in their practice who may have a range of mental, physical, cognitive, behavioural, social or spiritual needs.

In 2019 we published [new standards of proficiency for midwives](#) and these are organised under six domains, and were designed to ensure together they reflect what we expect a new midwife to know, understand and be capable of doing safely and proficiently, at the start of their career. This approach aims to provide clarity to the public and the professions about the knowledge, understanding and skills they can expect every midwife to demonstrate and will ensure midwives joining the profession can work in partnership with women and meet the needs, views, preferences and decisions of women and their babies, taking account of individual circumstances and the contexts in which women live.

Review of Post-registration standards

In 2019 we also embarked on a review of our post-registration standards to review:

- our [Standards of proficiency for specialist community public health nurses \(SCPHN\)](#); and
- our [Standards of proficiency for community nursing specialist practice qualifications \(SPQs\)](#).

Both these set of standards were approved by our Council and published in July 2022. The driving purpose behind reviewing our post-registration standards was to act as a bridge to advanced practice.

Our Standards of proficiency for community nursing SPQs apply to the five fields of community nursing SPQs that already existed (community children's nursing, community learning disabilities nursing, community mental health nursing, district nursing, general practice nursing) and a new community nursing SPQ in Health and Social Care. The evidence base and their application in these different fields of community nursing practice will differ. The new community nursing SPQ in health and social care does not specify a particular field of health and social care community nursing role; it can be applied to registered nurses who work in a range of specialist roles in the community, including potential new roles that are emerging in the community. Education providers seeking approval for delivering education programmes for community nursing SPQ are expected to specify the different fields of community nursing to set clear expectations for the public.

The Standards of proficiency for community nursing SPQs demonstrate what professionals with these qualifications need to know and be able to do that surpasses

the registered nurse proficiencies, to meet the diverse, often complex needs of people of all ages, in their home, in settings close to home and in the community. These nurses are expected to be involved in more autonomous decision making, and manage greater clinical complexity and risk, both in terms of the people they care for, the caseloads they manage and the services they work within, based on their specialist knowledge, skills and attributes.

A prescribing qualification is optional for community nursing SPQ programmes. Where community nursing SPQ programmes offer post-registration community nursing students admission to an NMC approved independent/supplementary prescribing programme (V300), it will be mapped to the [Royal Pharmaceutical Society \(RPS\) Competency Framework for all Prescribers](#) (updated 2021). This is the benchmark for safe and effective prescribing practice in all practice settings. Additionally, we would expect employers to have their own policies and procedures which should be checked and followed.

By 1 September 2024, we expect education providers together with their practice placement partners to meet our [Standards for post-registration programmes](#) (updated April 2023), in order to be approved to deliver a programme. They must also meet our [Standards for student supervision and assessment](#) (updated in April 2023) which apply to all NMC approved programmes.