

NMC response to the Call for Input on trade with Turkey

About Us

- 1 We are the UK's independent regulator of nursing and midwifery professions. We regulate over 808,000 nursing and midwifery professionals. Our purpose is to promote and uphold the highest professional standards 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.
- 2 Our core role is to regulate. To regulate well, we support our professionals and the public. Regulating and supporting our professionals allows us to influence health and social care.

Introduction

- 3 We welcome this call for input on the UK's trade negotiations with Turkey. It is vitally important that the direction of the UK's emerging trade policy is transparent and open to views. Our response builds on our previous submissions on other ongoing trade negotiations, most recently on [South Korea](#) and [Maldives](#).
- 4 We receive a relatively small number of applications from people who trained in Turkey. In total, there are 54 people on our register who trained in Turkey. However, numbers joining have been higher recently with 29 of these joining the register in the last two years compared with two in the preceding four years.
- 5 We have responded to those questions of greatest relevance to our regulatory role, which for the purposes of this call for evidence principally concern the facilitation of the movement of people and the mutual recognition of professional qualifications.

Which areas of the current trading relationship should the UK government aim to keep the same?

- 6 As the professional regulator of nurses and midwives in the UK, and nursing associates in England, our mandate is to protect the public. We uphold this mandate by requiring that all applicants evidence that they have the knowledge and skills needed to deliver consistent and quality care.
- 7 Consequently, our primary priority for the UK's trade policy is that regulatory autonomy to fulfil our mandate should not be undermined through the implementation of mutual recognition agreements or requirements to explore them as a result of trade agreements.

- 8 In particular, our position is that any trade deal between the UK and Turkey must not undermine our ability to apply the [Test of Competence](#) (ToC) as our method for assessing the ability for applicants from Turkey to practise safely and effectively.
- 9 The ToC is formed of two parts: a multiple-choice computer based theoretical test, known as the Computer Based Test (CBT), and a practical test known as the Objective Structured Clinical Examination (OSCE). It supports public safety because it is structured around our [pre-registration proficiency standards](#) which set out the knowledge, skills and attributes needed for nursing and midwifery in the UK specifically.
- 10 As these skills evolve and change, we can review and adapt the ToC to keep it aligned to reflect our new standards. This was done most recently in August 2021 in order to reflect our new [Future Nurse](#) and [Future Midwife](#) standards. This ensures that all those delivering care in the UK meet the same high standards, regardless of where they are trained.
- 11 In addition, the ToC supports the Government's ambition to see an efficient and fair process for the recruitment of internationally trained health professionals. It also underscores our commitment to fairness and non-discrimination in our processes.
- 12 Finally, the ToC helps ensure a reliable flow of qualified professionals onto the register. It offers a far more cost-effective and time-efficient method of assessment when compared to individual qualification assessment. We have previously undertaken work which looked at this in detail and found that putting a qualification assessment process in place for overseas applicants would be very resource intensive and would require extensive additional research before we could begin considering whether a qualification is comparable.

What are your main priorities and concerns about an enhanced trade agreement (or related talks) with Turkey?

- 13 Our main priority is ensuring that all nursing and midwifery professionals in the UK meet the right standards to maintain public safety. We are concerned about being sufficiently engaged in trade negotiations to be able to make sure this remains the case.
- 14 Any trade deal with Turkey should not look to provide automatic recognition rights, or mandate that we undertake an assessment of nursing and midwifery qualifications gained in Turkey. This would be disproportionately resource intensive given our existing well-tested systems for assessing applicants from Turkey. Additionally, given the complexity of trade deals, other issues could arise through the course of negotiations that we are not able to predict at this time.
- 15 It is therefore important that we are involved at the earliest opportunity to provide input and feedback on relevant areas in the deal, so we can highlight unintended consequences and help shape outcomes in mutually beneficial ways. We think the most sensible way to do this would be via a strengthened and more frequently organised Regulated Professions Advisory (RPAF) forum.

Is there anything else that you would want to say about the UK's future trade and investment relationship with Turkey?

- 16 Trade can provide an important opportunity to promote good regulatory practice. We see benefits for both the UK's and Turkey's health and care system if our respective professional regulation and education systems are better able to learn from one another, so that we are continuously pushing forward innovation and best practice. We think that an expanded trade deal could be an important enabler for this by providing a high-level framework which allows for closer regulatory engagement and knowledge exchange.
- 17 The UK continues to rely heavily on recruiting nurses and midwives trained overseas. We know that internationally-trained professionals bring a wealth of skills and insights to the UK. However, international nursing and midwifery professionals, and trade deals facilitating their movement and registration, should not be seen as a panacea to workforce shortages in the UK.

January 2024