

# **Nursing and Midwifery Council (NMC) response to Department of Health consultation ‘Reforming healthcare education funding: creating a sustainable future workforce’**

## **Introduction**

- 1 The Nursing and Midwifery Council (NMC) is the professional regulator for nurses and midwives in the UK. We exist to protect the public. We do this by holding and controlling access to the register of qualified nurses and midwives and setting standards of education, training, conduct and performance. If an allegation is made that a registered nurse or midwife is not fit to practise, we also have a duty to investigate and, where necessary, take action to protect the public.
- 2 We welcome the opportunity to respond to this consultation on changes to the funding arrangements for healthcare education. Our response is framed within the context of our remit as the professional regulator for nursing and midwifery. The consultation raises a number of issues which fall outside our remit and we do not address these in our response.

## **NMC comments**

### **Our regulatory role in education**

- 3 The NMC’s overriding objective is to protect the public and ensure that those who come onto our register have met the requirements for safe and effective practice as a nurse or midwife, having completed the requisite education programme. To ensure this, all nursing and midwifery education programmes that lead to entry onto the register, and the education institutions that deliver them, are subject to approval and quality assurance by the NMC.
- 4 Currently, our requirements for the pre-registration education of nurses and midwives are set out in our *Standards for pre-registration nursing education* (NMC, 2010) and our *Standards for pre-registration midwifery education* (NMC, 2009). Requirements for how students are to be taught and assessed whilst undertaking education and training activities in practice settings, including requirements for the training of those who act as mentors, sign-off mentors, teachers and practice teachers, are set down in our *Standards to support learning and assessment in practice* (NMC, 2008)<sup>1</sup>.
- 5 We have recently commenced a programme of reform of our education standards to ensure that they are fit for the future. This will include developing revised standards of proficiency for nurses of the future and carrying out a review of our quality assurance (QA) function. We will take into account the potential implications of these reforms if implemented (for instance, if there was a rise in new education providers wishing to start providing approved courses) in the context of our planned programme for work.

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<sup>1</sup> <https://www.nmc.org.uk/education/standards-for-education/>

- 6 Our statutory duties and current and future standards for nursing and midwifery education and the institutions that deliver these programmes are unaffected by the changes proposed in this consultation.

### **Impact on practice placements**

- 7 We are pleased that the consultation recognises the need for an increased capacity in practice placements to match the projected increase numbers of student numbers and also highlights the importance of maintaining a focus on quality (paragraph 5.5). A major expansion in student numbers to the scale of up to 10,000 additional students by the end of this Parliament, as estimated in the consultation, would have a sizeable impact on the health and care service. We encourage HEE to give careful consideration to how the implications for placement availability and support in practice learning will be managed as part of implementing these proposals.
- 8 If the proposals resulted in the growth of the number of students on nursing and midwifery courses that the Government hopes to see, this could place additional pressure on the availability of suitable placements. Approved education institutions report placement capacity already as an area of concern<sup>2</sup>, so the challenge of growing high quality placement capacity across a range of settings should not be underestimated.
- 9 High quality clinical placements are an essential part of pre-registration nursing and midwifery education. Practice placements are where nursing and midwifery students apply their knowledge to their developing practice and learn key skills to achieve the required competencies for registration. Students' learning is dependent on the time that mentors have available and the quality of support they can provide. Mentors being too stretched and having to accommodate more students than they can effectively support would have a detrimental impact on the quality of the students' learning experiences within practice settings.
- 10 In addition, mentors have a dual role of facilitating learning as well as assessing student competence at the end of the placements. The abilities of mentors to assess student competence could be compromised if their time and interaction with their student during placements is limited due to also having to prioritise patient care delivery. There is also a risk that students could be potentially supporting providing care provision in their supernumerary status without an appropriate level of supervision, which in turn could undermine patient safety. It will be essential in implementing these reforms to take into account how the maintenance of both the quality of training and patient safety could be assured in the event of a significant influx of additional students as predicted in the consultation.
- 11 Furthermore, through the HEE's role, there is currently a close connection between the commissioning of training places and the availability of placement opportunities. Given the proposed reforms will effectively remove this link, an

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<sup>2</sup> NMC (2015), Quality assurance of education and local supervising authorities: Annual report 2014–2015 <https://www.nmc.org.uk/globalassets/sitedocuments/midwifery-isa-reports/nmc-qa-of-education-and-local-supervising-authorities---annual-report-2014-2015.pdf>

appropriate mechanism will need to be put in place to ensure that student numbers are aligned with the number of placement opportunities required.

### **Access to the nursing and midwifery professions**

- 12 We believe that nursing and midwifery programmes should be accessible to all those who can demonstrate the necessary aptitude and potential, regardless of background. This is already reflected in the standards for NMC approved programmes. Our standards state that nursing and midwifery education providers “must treat all students fairly, and ensure equality of opportunity regardless of race, gender, disability, age, religion or sexual orientation”<sup>3</sup> (standard 2.1.1). The promotion of equality of opportunity also underpins our midwifery standards. It will be important to ensure that the proposals do not affect education providers’ ability to adhere to our regulatory framework, particularly in relation to selection for entry to our approved programmes.
- 13 Given the importance and benefits of having nursing and midwifery professions that reflect the communities they serve, changes to the student funding system should not act as a deterrent to entrants from diverse backgrounds. We would expect the consequences of the proposed reforms, particularly with regard to any changes in participation and equality implications, to be closely monitored both in the transition to the new funding regime and post-implementation.
- 14 Consideration of the likely impact on participation in the consultation document and the associated equality impact assessment is predicated on the experience of the previous bursary reforms for other groups of students. We would argue that there is a need to recognise the unique aspects of pre-registration nursing and midwifery degree courses (for example the need to complete a practice placement) or the different profile of nursing and midwifery students, which do not necessarily allow for such direct comparisons to be made. Also, as noted in the equality impact assessment, evidence from previous reforms suggests the move from grants to loans might be expected to deter some mature students, particularly in the initial years of reform, which will need to be carefully addressed.
- 15 We welcome the greater emphasis and clear focus on equality and widening participation in universities in the recent proposals set out in the *Higher education: success as a knowledge economy*<sup>4</sup> White Paper. Given the Government’s priority and goals to widen participation, it will be essential that the commitments set out in the White Paper are supported by the careful implementation of the changes to student funding.

### **Impact on post-registration training**

- 16 We note the consultation makes reference to the exemption for students wishing to study nursing or midwifery as a second degree, and also to eligibility for loans if

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<sup>3</sup> NMC (2010), Standards for pre-registration nursing education, <https://www.nmc.org.uk/globalassets/sitedocuments/standards/nmc-standards-for-pre-registration-nursing-education.pdf>

<sup>4</sup> Department for Business, Innovation and Skills (2016), Higher education: success as a knowledge economy, <https://www.gov.uk/government/publications/higher-education-success-as-a-knowledge-economy-white-paper>

undertaking pre-registration postgraduate courses. We would recommend that the Government gives further consideration to how the new system will operate for nurses and midwives undertaking post-registration training (such as in health visiting or district nursing) and what support will be available in such cases following the implementation of these reforms.