



Nursing and Midwifery Council (NMC) submission to the Times Health Commission

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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)

About Us

1. Our vision is safe, effective and kind nursing and midwifery practice that improves everyone's health and wellbeing. As the independent regulator of more than 788,000 nursing and midwifery professionals, we have an important role to play in making this a reality.
2. 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. Second, we maintain the register of professionals eligible to practise. Third, we investigate concerns about nurses, midwives and nursing associates – something that affects a tiny minority of professionals each year. We believe in giving professionals the chance to address concerns, but we'll always take action when needed.
3. To regulate well, we **support** our professions and the public. We create resources and guidance that are useful throughout people's careers, helping them to deliver our standards in practice and address new challenges. We also support people involved in our investigations, and we're increasing our visibility so people feel engaged and empowered to shape our work.
4. Regulating and supporting our professions allow 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.

Our submission

5. Our submission draws on our unique [data and insight](#)¹ to support and inform the work of the commission. Understanding the challenges facing nursing and midwifery professionals is a key element in addressing the wider workforce issues across the health and care sector. Our submission will outline how as a regulator we are undertaking work to address these challenges and what more we recommend sector partners and decision-makers across the UK need to do.
6. Our data and insight highlight two significant challenges in the sector: the consistent delivery of safe, person-centred care; and issues of recruitment, retention and culture preventing the nursing and midwifery workforce from delivering that care. It is essential that these challenges are addressed.
7. As an independent regulator operating across the UK, we have a unique role in supporting and enabling changes to positively impact the nursing and midwifery profession, and the care that they deliver, in all four nations. We have renewed the standards that we require all nursing and midwifery professionals to embody in their

¹ We note the commission's recommendations will be focused on the NHS in England although it will also consider the lessons to be learnt from around the UK. We are a UK-wide regulator, operating in Northern Ireland, Wales, England, and Scotland. Our data can be employed to examine all four nations together or separately.

practice, complementing [our Code](#), which stress the importance of leadership, compassion, and respect to improve care. We have also made changes to our standards for nursing and midwifery higher education to widen access, enabling more people from different backgrounds to join the profession.

8. We are committed to working with sector partners to improve the care that people receive. Our submission sets out recommendations for key decision-makers that will significantly improve the quality and safety of care for people and communities that nursing and midwifery professionals serve.
9. Looking forward, we are currently developing our corporate strategy for 2025-2030. Nursing and midwifery will need to embrace the increased use of digital technology to speed up processes and deliver high quality training that enables effective, kind and safe care. We already enable elements of simulation in education, and we expect the use of digital technology across training and practice to grow.

The current state of nursing and midwifery

A growing workforce

10. At a time of rising demand for health and care services, it is encouraging that our latest [Registration Data report](#) shows our UK register has risen to a record 788,638 between 1 April 2022 and 31 March 2023. In England, the total number of nurses, midwives and nursing associates grew by 3.2 percent and nursing associates saw the largest expansion with an increase of 35.7 percent.
11. Underlying this strong growth, 2022-2023 saw the highest number of new joiners to our UK register since the NMC was established in 2001. Of these, almost half (25,006) were internationally educated while the number of UK educated joiners rose by 8.5 percent to more than 27,142. The number of people leaving the professions fell by 1.4 percent.
12. International recruitment continues to grow at a significant rate, boosting the ethnic diversity of our register. Over the past year, the proportion of all registered professionals, including both international and domestic, who are from Black and minority ethnic backgrounds has risen to 27.7 percent – more than a quarter of the register.

Retention remains an issue

13. A decline in the number of people leaving the professions is welcome. However, our research into the reasons why people left highlights some clear warning signs for employers to consider.
14. Data from our recent [Leaver's survey](#) indicates that more than half (52.1 percent) of those who left the register did so earlier than planned and most said they were unlikely to return to the professions, including young leavers. There were five compounding workplace factors that frequently influenced people's decisions to leave: burnout or exhaustion; lack of support from colleagues; concerns about the quality of people's care; workload; and staffing levels.

15. [Our new research](#) into the experiences of nursing and midwifery professionals who have recently joined our register shows that where professionals lack the right support at the outset of their practice, consequences can be significant. It can affect their confidence, their sense of being able to practise safely and whether they intend to stay in their profession. This is particularly true for midwives and internationally educated professionals.

Racism and workplace culture are affecting quality of care and retention

16. Positive and inclusive working environments play a definitive role in our professionals' ability to provide the best care for people and the communities they serve. However, our data and insight show that standards of care are currently being negatively impacted by bullying and professionals experiencing racism and discrimination, leading to worse health outcomes for people and communities.
17. Our new report - [Spotlight on Nursing and Midwifery](#) - highlights the discriminatory experiences some staff are subjected to, including from colleagues and the public. International professionals told us about the impact of racism and poor workplace culture, including concerns about not being treated the same as local colleagues and an emphasis on getting on with the job at the expense of personal wellbeing.
18. Our [Ambitious for Change](#) research found that nursing and midwifery professionals experienced our regulatory processes differently with most saying their diversity characteristics played a part in their referral from their employer. This research and the [NHS Workforce Race Equality Standard](#) in England show that racism and discrimination are common experiences for minority ethnic professionals which has a detrimental impact on those professionals and the people they care for.

Concerns about maternity safety

19. A wealth of data and recent inquiries into maternity services have highlighted common themes in failings of midwifery care. They have also shown that inequalities in maternity safety outcomes for women of different ethnic backgrounds, ages and socio-economic circumstances continue to persist.
20. Our [recent research](#) into midwifery fitness to practise referrals has shown these failings in care are often the result of professionals' failure to act effectively when faced with emergency situations, as well as not communicating well enough with colleagues and people receiving care.
21. Outlined below are the changes and actions we believe are necessary to tackle these challenges facing the current nursing and midwifery workforce.

Support for high standards of person-centred care

22. As a professional regulator, one of our core roles is to set ambitious standards that outline the skills, knowledge, and experience that [nurses](#), [midwives](#) and [nursing associates](#) need to deliver safe, kind and effective care for the public.

23. Across the health and care sector, quality of nursing and midwifery care is reliant on [our Code](#) and these standards being embedded in practice. As we've highlighted above, recent inquiries into maternity services as well as our own research have identified instances where this is not happening. Failure to listen to women and escalate concerns appropriately have been a consistent issue.
24. We produce regular guidance to support professionals to embed our Code and standards in their practice. We've developed a [Caring with Confidence](#) campaign to support professionals to reflect on and live the values of the Code. We've also recently launched a new resource – [the best midwifery care happens in partnership](#) – that aims to support midwives to reflect on the importance of listening to women.
25. Our standards were designed for what people need now and over the coming decade, so are intentionally future-focused and future-proofed. We have emphasised the increased use and opportunity of digital and new technologies, and new areas of science such as genomics. In addition, we expect our professions to work from an evidence base and be person-centred in the care they provide.
26. Employers and leaders across health and care are central to ensuring that these standards and our Code are embedded. We want to work with our partners to understand how we can further support them to do this to ensure professionals deliver high-quality, person-centred care to address these current challenges and future challenges.

Effective education and training to grow the workforce

27. As outlined above, the number of UK domestically educated joiners to our register rose between 1 April 2022 and 31 March 2023. We know that continuing to grow the workforce, with a focus on domestic recruitment, is a priority for all governments across the UK. We're committed to supporting this growth, while ensuring those on our register have the right skills, knowledge and experience to deliver high-quality care.
28. Effective education and diverse training pathways that widen access and provide flexible learning opportunities are vital in supporting the growth of the domestic nursing and midwifery workforce.
29. In recent years, the NMC has delivered multiple changes to support the widening of access to our professions. We have:
- Pioneered degree apprenticeship routes for our professions.
 - Begun regulation of the new nursing associate role in England in 2019. This role requires a two-year foundation degree and has been impactful in promoting widening the entry route to nursing.
 - Made changes to our pre-registration nursing and midwifery programme standards to widen the entry gate, with the removal of the 12 years of compulsory education requirement. This has provided education institutions with increased flexibility on admission requirements and opportunities to broaden outreach.

- Made changes to our nursing [education programme standards](#) allowing up to 600 of the 2300 required practice learning hours to be via [simulated practice](#) – reducing pressure on health and care providers and placement settings while ensuring students meet our standards.
30. We are also committed to exploring whether further changes to our nursing education programme standards are appropriate to support workforce strategies across the UK. This includes research into practice learning requirements and what preconditions would be needed for us to consider a reduction in practice placement hours, such as improved placement capacity and supervision.
31. The education system is currently heavily reliant on placements in acute hospital settings, where there are significant staffing shortages. We welcome NHS England's Long-Term Workforce Plan commitment to increase placements in nursing homes, social care and community settings and the increased use of simulation to widen future professionals' skillsets.
32. We'd like to see academic institutions and placement partners support this by diversifying placement learning environments and offering more opportunities in multidisciplinary, multi-agency and community teams. This would alleviate the burden of supervision on acute hospital settings.

Support for newly qualified and international registrants

33. Making the transition from student or overseas nurse, midwife or nursing associate to registered professionals can be challenging. Good quality preceptorship² can help new professionals to feel more confident in their ability to provide good quality care and improve early attrition rates. We recommend that preceptorship programmes be provided consistently across the UK.
34. In 2022, we published our [Principles for Preceptorship](#) to assist with the welcome and integration of newly registered professionals into their teams and workplaces. We also developed a Welcome to the UK programme to help prepare and integrate internationally educated professionals for UK practise.
35. Employers are responsible for delivering preceptorship programmes. As a professional regulator, we can advise employers on good preceptorship practice, but we do not have the power to mandate it.
36. We are looking at what more we can do with our partners to ensure that new entrants to our register receive better support. We welcome the commitment in NHS England's Long-Term Workforce Plan to support trusts to adopt the National Preceptorship Framework.

² The main aim of preceptorship is to welcome and integrate newly registered professionals into their new team and place of work. It helps these professionals translate their knowledge into everyday practice, grow in confidence and understand how to apply the Code in their day-to-day work.

Positive and inclusive workplace cultures to improve retention

37. Creating inclusive environments and positive workplace cultures are essential to increasing retention across the nursing and midwifery workforce and improving standards of care for the public.
38. As a professional regulator, we have a critically important role to play in tackling discrimination and inequality as well as promoting inclusive cultures in all settings.
39. In response to our [Ambitious for Change](#) research, we published our [EDI Action Plan](#) which enhances leadership accountability for tackling discrimination as well as assessing whether bias is playing any role in our fitness to practise decision-making process.
40. In partnership with NHS England and NHS Confederation we supported the development of the [Combatting racial discrimination](#) resource, empowering professionals and leaders with practical examples on how they can recognise and challenge discrimination and provide care with confidence.
41. There is much more to do, and we will continue to work with employers and leaders across health and social care to target inequalities and help foster inclusive cultures, free from racism and discrimination.
42. Building positive cultures to retain the workforce is closely linked to a variety of factors, including access to support and development opportunities. To make nursing and midwifery attractive careers and improve retention of these professions, increased access to continued professional development (CPD) is needed. Regular and ongoing access to training and development opportunities for professionals are vital to advance their knowledge and skills in line with our standards and [revalidation](#) requirements and, most importantly, support them to deliver high-quality, compassionate care.
43. Providing professionals with opportunities to take on leadership and advanced practitioner positions, where experienced nurses and midwives increasingly take on complex, autonomous and expert roles, could go some way to boosting retention. We know advanced practitioner roles are growing. The NHS Long-Term Workforce Plan forecasts that over 3,000 clinicians will start advanced practice pathways annually.
44. [NMC commissioned research](#) by the Nuffield Trust in 2022 found great variation in how professionals are prepared, enter and practise in these advanced practice roles across the UK. This means there's no single definition of advanced practice, nor any consistent outcomes, or standards of education and proficiency. We are currently [undertaking an independent review](#) to consider whether additional regulation is needed to support advanced practitioners deliver quality person-centred care.

Comprehensive workforce planning

45. There is a need for a sufficiently joined-up approach to workforce planning across health and social care. To meet the needs of the current and future population and

achieve long term sustainability of the system, health and social care workforces should be considered together in terms of recruitment and retention, education and training and skills mix.

46. Both sectors are crucial in delivering high-quality care for the public. If we fail to account for the future needs of one, this will inevitably lead to gaps that will severely undermine the success of the whole system.
47. We welcome the Scottish Government's approach to workforce planning in the National Workforce Strategy for Health and Social Care in Scotland which considers both Health and Social Care together. Northern Ireland's integrated health and social care system also means the nursing sector as an entirety is considered in integrated workforce planning. We recommend similar plans are created by decision-makers in England and Wales.

Conclusion

48. We are committed to working with partners and decision makers to deliver change to address workforce challenges and support effective, safe and kind care for the public. Our regulatory role is our main driver for further improvements. Increasingly important is our work to support nursing and midwifery registrants as well as the public.
49. A key element is also understanding the nursing and midwifery workforce make up, how it is changing, the hopes and fears of nurses and midwives, and how these experiences can affect care. We are developing increasingly rich data and insight to support effective policy formulation to address these challenges.
50. We are happy to provide any further information to the commission and answer any questions.