

**Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol](#)
ar y [gweithlu Iechyd a Gofal Cymdeithasol](#)**

**This response was submitted to the [Health and Social Care](#)
[Committee](#) consultation on [Health and Social Care Workforce](#)**

HSC 06

**Ymateb gan: | Response from: Coleg Nyrsio Brenhinol Cymru | Royal
College of Nursing Wales**



Royal College of Nursing Wales (RCN Wales) response to the Health and Social Care Committee's call for written evidence.

About the Royal College of Nursing (RCN)

The RCN is the world's largest professional organisation and trade union of nurses, representing around 435,000 nurses, midwives, health visitors, healthcare support workers and nursing students, including over 27,000 members in Wales. RCN members work in both the independent sector and the NHS. Around two-thirds of our members are based in the community.

The RCN is a UK-wide organisation, with National Boards for Wales, Scotland and Northern Ireland.

The Health and Social Care Committee will be holding an oral evidence session with Health Education and Improvement Wales (HEIW) and Social Care Wales (SCW). The Royal College of Nursing Wales welcomes the opportunity to provide written evidence to the Committee ahead of the evidence session.

Health Education and Improvement Wales (HEIW)

Pre-registration nursing commissioning

The Welsh Government's budget for health and social care for 2021/22 was £9.6bn. The budget ensures the availability of health and social care services in Wales. A significant proportion of the budget is spent on funding the current workforce and commissioning a future workforce.

HEIW is responsible for providing the Welsh Government with recommendations on pre-registration nursing education. Funding is then decided by the Welsh Government based on these (private) recommendations from HEIW. These are then announced by a Welsh Government press release.

The Royal College of Nursing believes the current commissioning progress lacks sufficient transparency as stakeholders such as patient organisations, professional bodies and universities cannot meaningfully engage in the process to provide evidence on how to ensure the needs of the population are met. There is no formal process or transparency as to the rationale for decision-making.

In 2021 HEIW created an Education Advisory Group. The Royal College of Nursing was pleased to have a seat on this group believing the group would indeed be asked to provide advice. However, instead a presentation was provided to the group on workforce commissioning. No pre or post registration nursing figures were included in this presentation and the group was not invited to comment.

The ongoing lack of transparency has meant that the Royal College of Nursing alongside other professional bodies have not been able to provide evidence that would support investment in the workforce and ensure safe and effective care for the population. This is evident in the lack of investment in learning disability nursing. The number of learning disability pre-registration nursing places has remained at 77 since 2018 despite the population and professional need to grow and stabilise the workforce.

The Royal College of Nursing believes the process of establishing the education commissioning figures should be transparent and allow for stakeholders to contribute their expertise and constructively challenge the rationale of HEIW.

The pre-registration commissioning process needs to be transparent and consistent. Professional bodies, higher education providers and patient representatives should be able to contribute to the process. The Senedd should also be able to scrutinise the rationale.

A Healthier Wales: Our workforce strategy for health and social care

The Royal College of Nursing is concerned that there is a lack of alignment between the commissioning process and workforce strategy despite both being developed by HEIW.

The workforce strategy proposes several actions to deliver the vision of a healthier workforce. Actions include

- to review and develop targeted schemes for significant shortages in professional and occupational groups and hard to recruit areas, including nursing (*action 7*)
- develop a clear strategy for Continuing Professional Development (CPD) across professional and occupational groups (*action 24*)
- to develop workforce plans for key professional and occupational groups, in the first instance, nursing (*action 31*).

Despite listing nursing as a hard to recruit and priority area there has been little progress to address the significant shortages beyond the work of individual health boards. To appropriately address the shortages there needs to be alignment between the commissioning process and the workforce strategy.

An example of the disconnect between the commissioning process and workforce strategy is learning disability nursing. There is a significant shortage of learning

disability nurses and the field would benefit from investment. However the number of learning disability pre-registration nursing places has not increased since 2018 and before 2018 it merely increased by 7 places from 70 to 77. The chronic lack of investment in learning disability nursing should be addressed by utilising the workforce strategy to develop a targeted scheme whilst increasing the commissioning figures.

In addition to action 24, the strategy acknowledges the need to upskill the nursing workforce but there has been no investment in post-registration nursing education. Once again, the workforce strategy and the commissioning process are not aligned, and the needs of the workforce and consequently the public are not being met.

To ensure the success of the strategy, there needs to be alignment with the commissioning process, otherwise the ambition of the strategy will not be realised.

Post-registration nursing commissioning

After a nurse completes their pre-registration nursing degree there is an opportunity to specialise and advance their career. This often requires an additional degree or degree level study.

The Welsh Government is responsible for commissioning post-registration nursing education. Similarly to pre-registration nursing education, post-registration nursing education is decided by the Welsh Government based on (private) recommendations from HEIW.

There is currently no strategy for post-registration nursing commissioning. As a result, the current commissioning figures for post-registration nursing education are not sufficient and will not facilitate the skills and knowledge needed to care for the population. Here are three examples which highlight the chronic lack of investment in post-registration education.

District Nursing

There is a national shortage of district nurses (DN) and the Welsh Government have not taken action to resolve this. Community nursing teams are led by DNs or nurses working towards a post-registration community nursing masters. DNs are the experienced pinnacle of a community nursing team, providing clinical supervision and leadership to the registered nurses and health care support workers.

10 years ago there were 749 FTE DNs working in the community. Today, there are only 635. Today's data also needs to be taken with a pinch of salt as since 2016 health boards have miscoded nurses working in the community as DNs, this subsequently inflates the number.

For the last decade successive Welsh Governments have reconfigured acute hospital services, reduced bed numbers, encouraged shorter patients stays and enabled more complex treatments and care to be delivered at home.

So if the demand in the community is far greater than it was 10 years ago why hasn't the Welsh Government increased the number of DNs to ensure the provision of this care?

Consultants Nurse

In 2005 the Health Professions Wales assessed the need for consultant nurses and approved the need for 55 consultant nurse posts across Wales. There are currently only 35.6 FTE consultant nurses in Wales. It has been 16 years since the demand was made clear by the Health Professions Wales and yet Wales still falls short of the recommendations by nearly 20 nurse consultants.

In 11 years, the number of learning disability consultant nurses has not risen above 2 and since 2016 there has only been 1 learning disability consultant nurse. There is a desperate need to invest in learning disability consultant nurses.

Stats Wales provides nursing data as far back as 2009. During this time there have been no neonatal nurse consultants or school nurse consultants.

Consultant nurses provide leadership, advanced knowledge and expert skills, so why aren't HEIW investing in consultant nurses and ensuring post-registration opportunities for nurse to advance their careers.

Infection, Prevention and Control (IPC)

During the first wave of the COVID-19 pandemic, infection prevention and control (IPC) within hospitals, community settings and care homes was highlighted as an essential practice to ensure a safe environment for patients and residents.

As 'system' leaders and workers, IPC nurses consider a holistic approach to the prevention of infection, acting as a bridge between public health/health protection and science.

However, within IPC nursing there are few opportunities or structures available for nurses to advance their careers. In order to retain the existing nursing workforce and attract the future generation of IPC nurses, there must be a meaningful way of progressing throughout an IPC career, underpinned by access to appropriate and specialist training and education.

IPC has been proven to be essential, but there are limited post-registration opportunities in Wales for nurses to advance their careers and explore the field: in the wake of COVID-19, HEIW must ensure there are opportunities for nurses to do just that.

The Welsh Government needs to ensure that HEIW develop a strategy for post-registration nursing commissioning to ensure Wales has the skill mix and knowledge needed to care for the population.

Social Care Wales (SCW)

Care home providers and RCN Wales members have reported an acute shortage of registered nurses in the care home sector. An annual report by SCW detailed the number of registered nursing staff employed by commissioned care provided in 2019 was only 1,438; making up 3% of all staff employed by commissioned care providers in Wales¹. The percentage of nursing staff employed ranged from 0% to 4% between local authorities.

Despite the overall percentage of registered nursing staff remaining at 3% of the total workforce employed by commissioned care providers the total number had decreased from 1,545 in 2018, to 1,438. This decrease is concerning given the challenges the sector faces. If there are not enough registered nurses in the care home workforce then the quality of the nursing care provided will fall, resulting in poor health and reduced life expectancy for older people.

Despite the workforce strategy, the nursing workforce in the social care sector has not seen any investment.

RCN Wales has recently produced a nursing in care home report with seven recommendations for the Welsh Government, Social Care Wales and employers.

- 1. The Welsh Government should work with Social Care Wales (SCW) and Health Education Improvement Wales (HEIW) on a national campaign to raise the profile of registered nursing in Welsh care homes.**
- 2. The Welsh Government should consider options for a fairer and more sustainable way of financing the care sector in Wales.**
- 3. The Welsh Government should commit to expanding the scope of the Nurse Staffing Levels (Wales) Act 2016 to care homes. SCW should work in partnership with the Chief Nursing Officer (CNO) to establish interim safe staffing principles for care homes.**
- 4. The Welsh Government must support the Fair Work Commission and commit to offering nurses and health care support workers pay and benefits equal to that of the NHS.**
- 5. HEIW, health boards and trusts, and higher education institutes should work together to increase student placement opportunities within the independent social care sector.**

¹ [SCW workforce profile 2019 Commissioned-Services final EngV2.pdf \(socialcare.wales\)](#)

- 6. The Welsh Government, local authorities, and health boards and trusts should ensure care homes have access to infection prevention control nursing advice.**
- 7. The Welsh Government should consider carefully and mitigate any potential implications of the UK leaving the European Union (EU) on the care home workforce.**

The care home report has been attached as an accompanying document.