

**Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol ar Ddeddf Lefelau Staff Nyrsio \(Cymru\) 2016: craffu ar ôl deddfu.](#)**

**This response was submitted to the [Health and Social Care Committee consultation on the Nurse Staffing Levels \(Wales\) Act 2016: post-legislative scrutiny.](#)**

**NS10: Ymateb gan: | Response from:**

**Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg / Cwm Taf Morgannwg University Health Board**

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**Consultation response from Cwm Taff Morgannwg University Health Board.**

This narrative, authored by Richard Hughes and sponsored by Prof. Greg Dix, Executive Director of Nursing and Deputy Chief Executive of Cwm Taf Morgannwg University Health Board, presents insightful feedback as part of a Welsh Government consultation on the effectiveness and operational use of the Act. With expertise and leadership in the healthcare sector, Prof. Greg Dix supports Richard Hughes and their team in providing valuable insights on transparency, accountability, staffing challenges, reporting ambiguities, communication issues, and the need for a sustainable nursing workforce. This collaborative response aims to contribute to the ongoing enhancement and adaptability of the Act, ensuring its continued effectiveness in meeting the dynamic demands of healthcare provision.

### **Theme 1: Effectiveness and Accountability**

The Act has brought about significant improvements in transparency and accountability within the Health Board. Through the Act, the Health Board ensures greater transparency and accountability, allowing the public to access board papers, reports, and information as outlined in Section 25C of the NSWLA (2016). This is further supported by the biannual acuity audits mandated by the legislation, which provide additional evidence of transparency and accountability. The Act also empowers senior nursing teams and ward managers by giving them accountability and ownership within a defined framework. This framework supports workforce predictions and decisions regarding staffing levels, which may need to be increased or decreased in response to changes in specialty and acuity. Furthermore, the recent introduction of the Duty of Candour enhances transparency within the Health Board and supports effective and safe patient care. Through the Act, quality indicators are reported, shedding light on their impact on patient care and enabling continuous improvement.

## **Theme 2: Barriers to Compliance and Staffing Challenges**

Compliance with the legislation faces challenges due to the national and worldwide shortage of nurses. As a result, it becomes crucial to continuously reassess how care is delivered effectively and safely to patients. In situations where wards are operating at full establishment, staff may need to be redeployed to ensure safe staffing levels, resulting in disruptions to planned rosters. These decisions are made based on factors such as acuity, staff experience, skill mix, and professional judgment. To address these challenges, the implementation of the new Safe Care system will assist in reviewing data and identifying areas for improvement. However, staff redeployments can negatively impact morale and lead to staff leaving, as they may find themselves working in areas unknown to them or in specialties they did not wish to pursue.

## **Theme 3: Reporting and Ambiguity**

Although the Act covers all areas where nursing care is provided, there is some ambiguity surrounding reporting requirements for areas not explicitly covered in Section 25B. Reports are generated twice yearly for boards and every three years for the Welsh Government (WG). While all reports are available to the public, it has been observed that the data for both the November and May reports are duplicated. This duplication should be addressed to ensure accurate and streamlined reporting.

## **Theme 4: Communication and Operational Processes**

Occasional communication issues have been noted during changes in specialty or bed base within wards, where the prescribed process stipulated within the Act is not followed. To mitigate such issues, new processes will be promptly communicated and accompanied by the generation of templates. Additionally, education sessions will be conducted to ensure that new ward managers and senior nursing staff are fully aware of the operational processes outlined in the Act. This will help promote clarity and consistency in communication and adherence to the Act's guidelines.

## **Theme 5: Ensuring a Sustainable Nursing Workforce**

To ensure a sustainable supply of nursing staff that meets the needs of patients and the requirements of the legislation, it is crucial to undertake a local and national assessment of how nursing has evolved, particularly considering the changes brought about by the COVID-19 pandemic. An effective recruitment campaign targeting potential registrants is key to attract individuals who may not have an academic background, encouraging them to enter the nursing profession through apprenticeship-style routes. The development of Band 4 Registered Nursing Associate roles, as seen in England and with Assistant Practitioners in Wales, may need further attention to foster local talent and address future workforce needs. It is also important to consider budgetary constraints to accommodate necessary changes. Education on NSA (Safe Care/WLoC) is crucial not only for university students but also for the nursing workforce, and this education may need to evolve alongside forthcoming initiatives focused on the Team around the Patient concept.

## **Theme 6: Varied Approaches and Scope of the Act**

While work streams for mental health, district nursing, and health visiting are progressing towards the Whole of Community (WLoC) approach, there has been a loss of central control, resulting in different-paced approaches across Wales depending on each Health Board's priorities. Expanding the Act to additional areas will require careful consideration of the budgetary implications, as previously highlighted in scoping exercises. Furthermore, changes in the healthcare workforce and delivery necessitate slightly different approaches to setting staffing and quality standards. It is crucial to periodically review the Act to ensure it remains relevant in the evolving healthcare environment and adaptable to changes in care delivery methods. As the Act seeks to strike a balance between national standardization and local needs, it becomes increasingly challenging to standardize care delivery on a national level while ensuring it meets the specific requirements of the local population. The ongoing work involving the Team around the Patient concept will further influence the Act's scope. While the Act covers all areas where nursing care is delivered, there is a greater focus on specific patient groups and populations (Section 25B areas) that require reporting to the Board and the Welsh Government (WG).