

Response to:

***Nursing & Midwifery Council's consultation on the education framework:
standards for education and training***

On behalf of the Healthcare Education Group, we welcome the opportunity to respond to the NMC's consultation on the education framework: standards for education and training in nursing.

We have considered the proposals for a new education framework, in particular with regard to any implications on healthcare education and training in London. On the following pages we have outlined our response.

Submitted by, and on behalf of, London Higher's Healthcare Education Group [membership listed in Annex A]:

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The *Healthcare Education Group* is a forum bringing together senior representatives from those higher education institutions in London that teach, train or conduct research in the healthcare professions. This includes nursing, midwifery and the allied health professions. The group discusses emerging issues in the delivery of world-class healthcare education, research and service delivery.

The *Healthcare Education Group*, and *London Medicine* (which brings together the Heads of schools of medicine, dentistry and associated clinical academic institutions in London) together form *London Medicine & Healthcare*, which is a division of London Higher. London Higher is an 'umbrella' body representing nearly 50 universities and higher education colleges in London.

Implications of the NMC's proposed new education framework: standards for education and training

Proposals to move towards a less prescriptive education framework

The proposed new education framework for nursing aims to be less prescriptive than the current guidelines, thereby giving approved education institutions (AEIs) more freedom as to how nursing courses are structured, delivered and assessed.

The members of the Healthcare Education Group (HEG) are London-wide AEIs delivering nursing and midwifery education and training in the Capital. Whilst the group welcomes these changes to the NMC education framework and are broadly supportive of this move, a number of questions have arisen in discussion which could possibly affect London AEIs specifically.

In London, placement providers often accept placement students from a range of different AEIs. If AEIs are to have more freedom as to how their nursing courses are structured, even with a common Practice Assessment Document it could mean that placement providers will have to manage intakes of students who have varying skills and experiences, and who have varying expectations and learning objectives. This, along with different responsibility expectations from AEIs, could make it more challenging for placement providers to provide placement experiences that fulfil the requirements of all students who are on placement in that setting. HEG members are concerned that this could lead to additional time and resource pressures on placement providers.

HEG members would welcome clarity regarding the transition arrangements for the introduction of the new Education Standards. Any transition arrangements will need to take into account that AEIs have 3-4 more years of programmes in progress that will require adherence to the current Standards to Support Learning and Assessment in Practice (SLAiP).

Proposals to move from a mentorship model to a 'supervisor and assessor' model

The proposed new framework outlines a move away from the current mentorship model, in which a mentor both supervises and assesses students during their placements, towards a model where the two roles of supervisor and assessor are carried out by two separate individuals.

HEG members recognise that the current mentorship model system does not always function as well as it could, for instance there can be quality issues, or an insufficient supply of mentors. However, the group have some concerns with regard to losing this mentorship role altogether, and moving to a supervisor and assessor model. These concerns include:

- A nursing student in London can have up to seven placements during the course of one year. HEG members query whether it is realistic to expect one assessor to be able to liaise and communicate with all seven placement providers in order to accurately monitor and assess a single student's progress. Nursing placements can be very diverse, taking place in a wide variety of different placement settings. The group note that pulling all the relevant information together and making a judgment on a student's progress would be a substantial, and time-consuming, task.
- The language used to describe the role of the supervisor will be important. While their primary role is not to assess students it needs to be clear that they do have a role in providing regular comments and formative feedback to students.

- The time burden on assessors will be amplified if one individual is tasked with assessing a number of students. Assessors would need protected time if they are to fulfil this responsibility properly. Also, there seems to be an assumption that clinicians in roles such as Practice Educators or Clinical Practice Educators would be best placed to act as practice assessors. However, these staff already face many time pressures, and additionally these kind of posts are not an option in some areas of healthcare.
- The funding implications, both for AEIs and for placement providers, will need to be fully considered and costed if this proposed model is adopted. For example, training new assessors and mentors, developing/changing courses, staff changes etc. Under the new system AEIs will be expected to provide “adequate preparation” to practice supervisors and assessors. We would welcome clarity as to what “adequate” means in this context. London’s landscape is one in which placement providers often accept students from a number of different AEIs. AEIs will need to work together in order to ensure a consistency of approach. With the loss of SLAiP standards, it is likely that the costs of preparation will fall to AEIs.
- Staff turnover could have an impact on the capacity for accurate assessments of students to be made. If an assessor leaves their role partway during a year there will need to be robust contingency arrangements to ensure that the students they are responsible for assessing are assessed fairly, and with all of the placements they’ve undertaken during the year, being properly assessed. This would be a particular issue for London AEIs, as staff turnover in London is often higher than in other areas of the country. The role of the sign-off mentor within the current system has evolved and these individuals can be responsible for making difficult and complex decisions. Thought needs to be given as to how this process will take place within a new system.
- The proposed new framework indicates that it will be the responsibility of AEIs/Trusts and Organisations to set their own standards for the role and development of the practice supervisor and assessor, the success of this (or not) would be measured during NMC Monitoring visits. However HEG members believe this would place reviewers in a challenging position where they would have to review, measure and evaluate supervisors and assessors with no minimum national baseline. There should be consideration given to the design of a minimum level of expectation in order to ensure a baseline of what is expected for development and on-going monitoring of these roles.

Conclusion

HEG members are broadly supportive of moving towards a less prescriptive education framework, which allows more opportunity for innovation and creativity. However, we have some concerns that this move will bring about additional pressures for AEIs and for placement providers, as outlined above. HEG members are concerned that if placement providers find the new system too burdensome, some may choose not to accept placement students in the future. In London, where there is already a short supply of some types of placement provided, this is a particular concern. If the placements for students are not available this will limit the number of students that can be trained and educated in London’s AEIs.

Annex A: Healthcare Education Group Membership 2017/18

Institutions/Organisations

Anglia Ruskin University
Brunel University London
Bucks New University
City University London
King's College London
Kingston University London
London South Bank University
Middlesex University London
University of East London
University of Greenwich
University of Hertfordshire
University of West London

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