

Nursing and Midwifery Council’s response to Royal College of Nursing’s consultation on ‘Adult safeguarding framework – roles and competences’

1. This document provides the Nursing and Midwifery Council’s response to the Royal College of Nursing’s (RCN) consultation on ‘Adult safeguarding framework – roles and competences’.¹ It includes the consultation response table which was submitted to the RCN.

Key area for improvement Please use page & point no. (e.g. p15 3.2.1) or ‘general’ if your comment relates to whole document	Why is this important?	Why is this a key improvement? Evidence or information that statement requires improvement?	Supporting information If available, any local/national data relating to your suggested key areas for improvement?
General - introduction	We welcome the opportunity to respond to this consultation and we are supportive of the ambition of the intercollegiate competency framework for healthcare staff to support adult safeguarding. Our response set out a number of overarching points followed by specific comments on the draft framework.		

¹ <https://www.rcn.org.uk/get-involved/consultations/rcn-001-18>

<p>General – references to professional codes and standards</p>	<p>In our view, it would be helpful if the final framework included specific references to that registered health and social care professionals must also continue to abide by their professional codes and standards.</p> <p>This would not necessarily be tied to the specific competency levels of the framework, and it would therefore be helpful if this could be included in an introductory section or under the section outlining the scope of the framework.</p> <p>As a part of this it would be helpful to have an annexe signposting to the relevant regulators and their professional standards.</p>	<p>It would be helpful to include references to professional codes and standards as it would link together this framework with the professional requirements. This would minimise the risk of confusion, both among health and social care professionals and employers, of what is expected of them.</p> <p>The professional standards that all nurses and midwives must uphold are set out in our Code. It can be accessed here - https://www.nmc.org.uk/globalassets/sitedocuments/nmc-publications/nmc-code.pdf</p>	
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<p>General – the professional duty of candour</p>	<p>The draft framework includes references to health and social care staff being able to identify safeguarding concerns and to raise these issues. We are supportive of this, however we feel the framework would benefit from a specific reference to the professional duty of candour.</p>	<p>In our view a specific reference to the professional duty of candour would be helpful in linking together the framework with the professional standards expected of registered health and social care professionals.</p> <p>The professional duty of candour is paramount throughout the health professions and is explicitly set out in professional standards, including in our Code.</p> <p>Inclusion of a reference to the duty of candour would minimise the risk of confusion of what is required of registered health and social care professionals and align the framework more closely with professional codes and standards.</p>	
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<p>General – cultural competence and equality and diversity</p>	<p>We believe it would be helpful to have a more developed and overarching approach to cultural competence and equality and diversity in the final version of the framework.</p> <p>Cultural competence links to the concept of person-centric care and is tied in with professional codes of conduct and standards, including in our Code for nurses and midwives. It sits within the wider idea of embedding the principles of equality and diversity within all aspects of care and services. It would help ensure that safeguarding issues are understood from a cultural perspective allowing for individuals needs to be kept in mind during the delivery of care.</p> <p>Therefore it would be helpful to incorporate cultural competence and equality and diversity considerations throughout the framework.</p> <p>Relating to this, there are resources available to support health and social care professionals, for example Health Education England has produced e-learning tools on cultural competence - https://www.e-lfh.org.uk/programmes/cultural-competence/</p>	<p>Cultural competence and equality and diversity are well embedded principles in health and social care, and it would therefore be beneficial to have these considerations further integrated in this framework.</p> <p>Cultural competence and equality and diversity considerations are also incorporated in professional codes and standards. Incorporating these principles in the framework would enable it to be more closely aligned with the professional requirements.</p> <p>The importance of cultural competence has been recognised by the Royal College of Nursing (RCN). In their publication 'Getting it Right for Children and Young People - Self assessment tool for general practice nurses and other first contact settings providing care for children and young people' https://www.rcn.org.uk/professional-development/publications/pub-006507) one of its core competencies is to "recognise equality and diversity and demonstrate cultural competence".</p> <p>Even though this document is aimed at children and young people, the overarching principles remain the same with regards to the safeguarding of adults.</p>	
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<p>General – staff levels</p>	<p>It would be helpful to have a clearer understanding of how the different competency levels in the framework have been developed and how they relate to the mentioned professions, including if these relate to, for example, Agenda for Change banding or education levels.</p> <p>Nurses are mentioned under level 2 and 3 however midwives are mentioned under level 3 only. This potentially risk causing confusion as the professional requirements set out in our Code apply to all nurses or midwives, independently to which level they would fall under this framework. Therefore we would encourage the RCN to consider if nurses and midwives would fall under the same level.</p> <p>In addition to this the document set out that it is for organisations to decide if certain roles for nurses and medical professionals (p.10, 8) should be either level 2 or 3. However it is not clear what this process would look like and how it would work in practice.</p> <p>Furthermore, it would be helpful if the list of professions is exhaustive, for example physiotherapists are not mentioned, or that it is drafted in such a way as to provide for of a fuller description of what would constitute a level 2 role.</p>	<p>Nurses are listed as both potentially either level 2 and 3 professionals and midwives are listed solely under level 3. It is not clear why this is and we would encourage the RCN consider if this could cause any unintended consequences.</p> <p>For example, under this framework a level 2 nurse would be asked to meet different core competences than a level 3 nurse. However, this risk causing confusion as they would both be required to abide by the professional requirements in our Code, including relating to the professional duty of candour.</p>	
<p>p.2, 1 - Scope</p>	<p>It would be helpful if it is made clearer in the 'scope' section that the framework is designed to be UK wide.</p>		

p.3, 2.6 - Designated Professional or Equivalent Role	This section mentions doctors, nurses or allied health professionals as designated professionals with specific roles and responsibilities for safeguarding adults. However, this section would likely in practice include a wider range of professions, including midwives.	Adding midwives and other relevant professions to this list would enable it to more accurately reflect what this could look like in practice.	
p.3-4, 2.10 - Professional	<p>Currently the NMC, GMC and HCPC are listed in this section. However as the document is designed to be able to apply to all health and social care professionals it would be helpful if this section listed all the healthcare professional regulators in the UK.</p> <p>Furthermore, as social care legislation is devolved it would be beneficial to include the social care regulators and agencies across the four countries of the UK.</p>		
p.10, 8.1 – Staff groups	<p>The section lists a number of level 2 professions, including nursing associates. It is important to note that we are currently consulting on our standards of proficiency for nursing associates, including on how these link in with safeguarding.</p> <p>We welcome views from the RCN and other stakeholders on whether these standards are sufficient. Following the consultation and stakeholder engagement, our Council will approve the nursing associate proficiencies in September 2018.</p>		<p>The consultation document on we will regulate the new nursing associate role can be accessed here - https://www.nmc.org.uk/standards/nursing-associates/nursing-associate-consultation/</p>