



31<sup>st</sup> January 2024

Russell George MS  
Chair of Senedd Health and Social Care Committee

Emailed to: [russell.george@senedd.cymru](mailto:russell.george@senedd.cymru)  
cc: Members of the Health & Social Care Committee

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**Helen Whyley, RN, MA**  
Director, RCN Wales

Telephone [REDACTED]  
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Dear Russell,

I write to you to ask the Senedd's Health and Social Care Committee to **scrutinise the recent decision made by the Minister for Health and Social Services to introduce the role of Registered Nursing Associate in Wales.**

On 19<sup>th</sup> January, the Minister for Health and Social Services announced her intention to introduce a regulated band 4 nursing role for the NHS in Wales, subject to the necessary UK legislative amendments. The Minister wrote in her statement that she will "*undertake public consultation on developing the parameters of practice for the new role in Wales*" later in the year, and described the change as being the "*biggest and most impactful review of nursing in Wales since the introduction of the graduate nurse in 2004.*"<sup>1</sup>

RCN Wales welcomes the Minister's statement that she will open a public consultation on the scope of the role but believes that the public also needs to be consulted on the question of whether the nursing associate role should be introduced into Wales at all. The Minister has taken this decision before sharing publicly the findings and recommendations of the work undertaken to gather evidence and stakeholder views. RCN Wales looks forward to scrutinising this report when it is published. The Minister has expressed her commitment to the Royal College of Nursing towards continued collaborative working between her officials and RCN Wales as the work to introduce this role unfolds. RCN Wales welcomes this.

Answers to key questions surrounding the policy have not yet been provided by the Welsh Government. RCN Wales believes that the Health and Social Care Committee should scrutinise the Welsh Government's policy to ensure answers to the following questions:

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<sup>1</sup> [Written Statement: Policy Intent for introduction of a regulated band 4 nursing role for the NHS in Wales, subject to the necessary UK legislative amendments \(19 January 2024\) | GOV.WALES](#)

- **What is the financial impact of the proposed changes she has outlined with the introduction of the registered nursing associate role in Wales?**
- **How much government funding has been allocated for this introduction?**
- **What are the financial implications for both the funding of the education of the Trainee Nursing Associate and the individual health boards costs with the implementation of this policy?**
- **Can the Welsh Government provide assurance that government funding will not be removed from the HEIW financial allocation to degree level pre-registration nursing to fund this new initiative?**

In addition, RCN Wales asks the Health and Social Care Committee to make a recommendation as part of its safe staffing inquiry to include appropriate use of nursing associates in the statutory guidance.

Along with this letter, I attach a briefing for the attention of the Health and Social Care Committee outlining some of the concerns that RCN Wales has surrounding the decision to introduce the role of the nursing associate in Wales.

I look forward to further discussion of this matter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Helen Whyley', written in a cursive style.

**HELEN WHYLEY, RN, MA  
DIRECTOR, RCN WALES**

# RCN Wales concerns regarding the planned introduction of nursing associates in NHS Wales

*A briefing for the Senedd Health and Social Care Committee*

Key action point:

**RCN Wales calls for Health and Social Care Committee scrutiny on the Welsh Government's new policy to introduce nursing associates in NHS Wales**

On the 18th of December, the Minister for Health and Social Services wrote to RCN Wales Director, Helen Whyley, giving her *“formal notification of the new Welsh policy position and my intention to trigger the next important work stream to prepare for the potential introduction of a regulated band 4 nursing role in Wales, pending the necessary legislative amendments.”*

Subsequently, on 19 January 2024, the Minister for Health and Social Service issued a written statement officially [announcing her intention to introduce the Nursing Associate role into Wales](#), subject to the necessary UK legislative amendments.

Registered nursing associates have been part of the Nursing and Midwifery Council (NMC) register in England since 2018.<sup>1</sup>

The NMC's powers and duties are set out in its governing legislation, which is the Nursing and Midwifery Order 2001. Amendments to the Nursing and Midwifery Order can be made using the powers under Section 60 of the Health Act 1991.<sup>2</sup> The new policy was introduced in England in the form of The Nursing and Midwifery (Amendment) Order 2018.<sup>3</sup>

With the regulation of professional bodies being a reserved matter, the Minister for Health and Social Services is requesting that the UK legislation be amended to allow the NMC register to include nursing associates in Wales.<sup>4</sup>

RCN Wales is calling on the Committee to scrutinise this decision by the Welsh Government to introduce the role of the nursing associate in Wales.

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<sup>1</sup> [RCN position statement on the role and scope of practice of the Nursing Associate | Royal College of Nursing](#)

<sup>2</sup> [Rona-consultation.pdf \(publishing.service.gov.uk\)](#)

<sup>3</sup> [The Nursing and Midwifery \(Amendment\) Order 2018 \(legislation.gov.uk\)](#)

<sup>4</sup> [Backlash over plans for regulated band 4 nursing role in Wales | Nursing in Practice](#)

Key points:

1. The Royal College of Nursing believes that the introduction of nursing associates could be a positive addition to the current workforce, provided that it is **fully funded** and that it is **in addition to the current workforce**.
2. The Royal College of Nursing is clear that, under no circumstances can the replacement of registered nurses by nursing associates be allowed, as this would seriously increase the risks to **patient safety**.
3. The Royal College of Nursing believes that **health care support workers** (Agenda for Change bands 1-4) are an essential part of the nursing workforce. Nursing associates should join the nursing team as an addition rather than as a replacement.
4. The Royal College of Nursing requests more information on the planned funding from the Welsh Government for the introduction of the nursing associates role.

**Suggested questions for the Minister for Health and Social Services:**

1. What will be the **financial impact** of this new policy?
2. How much government **funding** has been allocated for this introduction?
3. What are the financial implications for both the funding of the education of the **Trainee Nursing Associate** and the individual health boards costs with the implementation of this policy?
4. Can the Minister for Health and Social Services give a clear assurance that government funding will not be removed from the HEIW financial allocation to degree level pre-registration nursing to fund this new initiative?



## What is the role of the registered nurse?

The Royal College of Nursing defines [the role of the registered nurse](#) as follows:<sup>5</sup>

- Nursing is a safety critical profession founded on four pillars: **clinical practice, education, research, and leadership.**
- Registered nurses are decision makers. They use clinical judgement and problem-solving skills to manage patient care.
- Registered nurses coordinate the complexity of health and social care systems to ensure people and their families are enabled to improve, maintain, or recover health by adapting, coping, and returning to live lives of the best quality, or to experience a dignified death.
- Registered nurses have high levels of autonomy within nursing and multi professional teams, and they delegate to others – including nursing associates – in line with the NMC code.
- Registered nurses supervise the work of the nursing team, and in this role will remain professionally accountable for that supervision.
- Registered nurses use evidence-based knowledge, professional and clinical judgement to assess, plan, implement and evaluate high quality person-centred nursing care.
- The work of registered nurses consists of many specialised and complex interventions. Their vigilance is critical to the safety of people, the prevention of avoidable harm and the management of risks regardless of the location or situation.
- The responsibility of registered nurses includes leading the integration of emotional, physical, organisational, and cognitive nursing work to meet the needs of people, organisations, systems, and populations.



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<sup>5</sup> [Definition and Principles of Nursing | Royal College of Nursing \(rcn.org.uk\)](#)

## The need for registered nurses

Low staffing of registered nurses on wards can increase patient mortality by up to 26%.<sup>6</sup> On the other hand, with every 10% rise in the number of degree educated nurses, patients are 7% less likely to die.<sup>7</sup>

Safe and effective nurse staffing levels reduce readmissions, health care associated infection rates, medication errors, falls, and pressure ulcers. Safe nurse staffing levels ensure patients receive safe and effective hydration, nutrition and communication.<sup>8</sup>

It allows nursing staff time to care for people in a way that is compassionate and sensitive to their needs.

## The Mid Staffs Hospital Scandal

The Mid Staffs Hospital Scandal underlined just how crucial nurses are to patient safety and why a short staffing of nursing costs lives.



Between January 2005 and 2008, at least 400 more people lost their lives at Stafford hospital than would be normal for a hospital of its size, in what is widely considered one of the biggest scandals in the NHS's 75-year history.

<sup>6</sup> Rafferty AM, Clarke SP, Coles J, Ball J, James P, McKee M, Aiken LH. Outcomes of variation in hospital nurse staffing in English hospitals: cross-sectional analysis of survey data and discharge records. *Int J Nurs Stud*. 2007 Feb;44(2):175-82. doi: 10.1016/j.ijnurstu.2006.08.003.

<sup>7</sup> Aiken LH, Sloane DM, Bruyneel L, van den Heede K, Griffiths P, Busse R, Diomidous M, Kinnunen J, Kózka M, Lesaffre E, McHugh MD, Moreno-Casbas MT, Rafferty AM, Schwendimann R, Scott PA, Tishelman C, van Achterberg T, Sermeus W. Nurse staffing and education and hospital mortality in nine European countries: a retrospective observational study. *The Lancet*. 2014 May;383(9931):1824-1830. doi: 10.1016/S01406736(13)62631-8.

<sup>8</sup> Rafferty, A.M et al. (2007). Outcomes of variation in hospital nurse staffing in English hospitals: cross sectional analysis survey data and discharge records. *International Journal of Nursing Studies*. 44(2), 175-82. <https://doi.org/10.1016/j.ijnurstu.2006.08.003>

An [inquiry headed by Robert Francis KC](#) found that one of the principal causes of the scandal was low staff-to-patient ratios.<sup>9</sup> The Trust had put cash before care, reducing its already low numbers of nurses and handed those left an impossible task. It is imperative that lessons are learnt and that this is never repeated.

## What are nursing associates?

- Nursing associates in England have been part of the NMC register since 2018. The role was introduced in response to the [Shape of Caring review](#) (2015)<sup>10</sup> to help build the capacity of the nursing workforce and the delivery of high-quality care (HEE) Health Education England. The purpose was to provide a bridging role between unregistered healthcare assistants and registered nurses (RNs), filling a perceived skills gap and offering an alternative route into nursing.
- When the role of the nursing associate was first introduced into England, the Royal College of Nursing produced [job description and preceptorship guidance](#), in collaboration with Health Education England and others.<sup>11</sup>
- NAs are part of the nursing workforce, who have gained a Foundation Degree, and are accountable for their practice. They are subject to the NMC Code and once practising can undertake further training and education to achieve additional knowledge and skills, enhancing their competence. They must also undertake revalidation, in line with NMC requirements.
- The scope of practice of the NA is to provide, monitor and contribute to integrated care.



## What are the differences between nurses and nursing associates?

The differences between the role of the registered nurse and that of the nursing associate can be summarised as follows: while nursing associates are accountable for the care they provide, it is only the responsibility of the registered nurse to assess care needs, plan, lead and manage care, and evaluate the care provided.

For further information, please see this [useful guide](#) that the NMC has produced.<sup>12</sup>

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<sup>9</sup> [Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry - GOV.UK \(www.gov.uk\)](#)

<sup>10</sup> [Shape of caring review | Health Education England \(hee.nhs.uk\)](#)

<sup>11</sup> [Become a nursing associate | Royal College of Nursing \(rcn.org.uk\)](#)

<sup>12</sup> [Blog: Role differences between nursing associates and nurses - The Nursing and Midwifery Council \(nmc.org.uk\)](#)

## Potential positive impact of the introduction

If additional funding is available to adequately fund the introduction of nursing associates, and provided that nursing associates are genuinely additional to the existing workforce, this decision could have some positive impacts.

An evaluation of the nursing associates pilot programmes in England, found that 70% of trainee NAs expressed a desire to become registered nurses<sup>13</sup>, suggesting that many nursing associates feel valued in their roles. However, it is worth bearing in mind that this progression is not always supported by employers who are often keen to embed the nursing associate role in organisations.<sup>14</sup>

## Concerns over the introduction of nursing associates and potential risks for patient safety

The Royal College of Nursing welcomes the assurance given by the Minister that nursing associates will not substitute registered nurses. Provided that it is the case that this assurance will be reflected in the implementation of the new policy, it is unlikely that the introduction of nursing associates in Wales will put patient safety at risk; however, if that is not the case, then RCN Wales will have serious concerns about the potential risks for patient safety.

An evaluation of the Nursing Associates role in England, published by Kings College London, showed that trusts were developing the role and associated competencies to meet the needs of the services provided, adding to the degrees of variation across employers and settings<sup>15</sup>. This has led to the blurring of boundaries and concerns that nursing associates are being recruited into registered nurse vacancies.

In her letter to RCN Wales Director Helen Whyley, the Health and Social Services Minister acknowledged our concerns that this new role could be used inappropriately as substitution for registered nurses in patient care and stated that she does not support this. RCN Wales very much welcomes this.

Nursing associates cannot replace a registered nurse. Any attempt to replace registered nurses with nursing associates will lead to a sharp increase in patient mortality and will seriously affect patient outcomes.

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<sup>13</sup> [https://allcatsrgrey.org.uk/wp/download/nursing/TNA-Year-2-Evaluation-Report\\_0.pdf](https://allcatsrgrey.org.uk/wp/download/nursing/TNA-Year-2-Evaluation-Report_0.pdf)

<sup>14</sup> Kessler I, Steils N, Samsi K, Moriarty J, Harris J, Bramley S and Manthorpe J (2020a) Evaluating the Introduction of the Nursing Associate Role in Health and Social Care: Interim Report. NIHR Policy Research Unit in Health and Social Care Workforce, The Policy Institute, King's College London. [Nursing Associates Interim Report 2020.docx \(kcl.ac.uk\)](#)

<sup>15</sup> [Evaluating the Nursing Associate Role: Initial Findings | Health & Social Care Workforce: \(kcl.ac.uk\)](#)



Further information regarding the Royal College of Nursing's view on the role of the nursing associate can be found [here](#).<sup>16</sup>

### *Role substitution*

The evidence is very clear that it is the professional knowledge, skills and judgement of the registered nurse in a supervisory position that makes the critical difference to patient safety and outcomes. Yet role substitution – the use of support staff for roles and tasks that require a registered nurse – is a very real risk.

Role substitution happens when employers in both the NHS and independent sector, struggling to fill gaps in their registered nursing workforce, resort to simply changing the level of the vacant registered nurse post to that of an assistant practitioner (AP), nursing associate, or health care support worker (HCSW). It has also been linked to a heightened risk of patient death, [according to a study published by BMJ Quality and Safety \(2016\)](#).



It would also be problematic to replace healthcare support workers with nursing associates: healthcare support workers are an essential part of a health or social care team, providing high quality and compassionate care to individuals, carrying out well defined routine clinical duties and essential fundamentals of care.

Support staff such as HCSWs and APs are a vital part of the nursing workforce. Nursing support workers may have different levels of experience, qualifications, and specialisms, and a variety of job titles to reflect this such as Assistant Practitioner. Their contribution is both invaluable and different from that of a registered nurse. It is important that support staff have the clinical supervision and direction of a registered nurse. They should never be pressured to work beyond their competencies or scope of practice, nor should they be used to substitute registered nurses or fill registered nurse vacancies. The [Nurse Staffing Levels \(Wales\) Act 2016](#) is unambiguous in saying that while a registered nurse may delegate duties to other staff, it is the nurse's presence that matters for patient safety:<sup>17</sup>

*“The number of nurses means the number of registered nurses (this being those with a live registration on Sub Parts 1 or 2 of the Nursing and Midwifery Council register). In calculating the nurse staffing level, account can also be taken of nursing duties that are undertaken under the supervision of, or delegated to another person by, a registered nurse”*

Developing new roles such as assistant practitioners and nursing associates should not be taken lightly. Their purpose should be clearly defined before introduction. The risk of

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<sup>16</sup> [Registered nurse substitution | Professional Nursing | Royal College of Nursing \(rcn.org.uk\)](#)

<sup>17</sup> [Nurse Staffing Levels \(Wales\) Act 2016 \(legislation.gov.uk\)](#)

patients receiving substandard care – resulting in direct or indirect harm – is significant. There should be no possibility of inappropriate role substitution with the introduction of new roles in either health or social care.

RCN Wales welcomes the Minister’s acknowledgement in her letter of the protection the Nurse Staffing Levels (Wales) Act 2016 provides to patient care. Statutory guidance and operational guidance could be refreshed to minimise or mitigate against the risk of role substitution.

### **The need for scrutiny**

*“ . . . the biggest and most impactful review of nursing in Wales since the since the introduction of the graduate nurse in 2004”.*

- The Minister has taken this decision before sharing publicly the findings and recommendations of the work undertaken to gather evidence and stakeholder views.



- The Royal College of Nursing is the professional body representing over 30,000 registered nurses and healthcare support workers in Wales. It would therefore have been helpful to the Minister to receive our views and advice on this review

which, as she describes in her letter, is “the biggest and most impactful review of nursing in Wales since the since the introduction of the graduate nurse in 2004”.

RCN Wales welcomes the Minister’s statement that she will open a public consultation on the scope of the role but believes that the public also needs to be consulted on the question of whether the nursing associate role should be introduced into Wales at all.

The Minister has expressed her commitment to the Royal College of Nursing towards continued collaborative working between her officials and RCN Wales as the work to introduce this role unfolds. RCN Wales welcomes this.

## Questions over funding

It would be helpful to know more detail about the planned introduction of nursing associates in Wales. An explanation of how this will be funded, for example, would be welcomed. In the interest of effective scrutiny, it is important that the Minister for Health and Social Services is able to answer the following questions:

- How much money is needed to introduce nursing associates in Wales?
- How much money is being allocated towards this?
- From what budget will the funding come?

The Welsh Government has not yet made clear how much money will be needed to introduce this new role in NHS Wales, how much money it is planning to spend on this plan nor from what budget this funding will come.

If this new role is intended to be an enhancement of the nursing care offered to patients, then the funding provided for this role must be in addition to the funding already provided for the education and retention of registered nurses.



Essential services are already overstretched and underfunded; unless clarity is given regarding on the issue of funding, it is difficult to know how exactly the introduction of the nursing associate role will benefit patients.

12 February 2024

Russell George MS  
Chair of Senedd Health and Social Care Committee

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**Helen Whyley, RN, MA**  
Director, RCN Wales

Telephone [REDACTED]  
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Dear Russell

I am aware that the Senedd Health and Social Care Committee is currently in the process of writing its inquiry report into Nurse Staffing Levels (Wales) Act 2016: post-legislative scrutiny. The Royal College of Nursing was very grateful to have had the opportunity to provide evidence to the Committee on 17 October 2023 as part of the inquiry.

I write to you today to request that the Health and Social Care Committee considers the implications of the Welsh Government's recent publication of its intent to introduce the registered nursing associate role in Wales, as part of its forthcoming report into Nurse Staffing Levels (Wales) Act 2016: post-legislative scrutiny.

I was informed by the Minister for Health and Social Services, who wrote to me on 18 December 2023, that she does "*not support RN substitution and consider the Nurse Staffing Levels (Wales) Act facilitates a degree of mitigation for Wales.*" RCN Wales shares the Minister's concerns about the potential risks for role substitution and welcomes her commitment to mitigate against these risks as the registered nursing associate role is introduced.

In the interests of patient safety, RCN Wales believes that the Minister for Health and Social Services should consider extending the duties in section 25B of Nurse Staffing Levels (Wales) Act 2016 to include all areas in which registered nursing associates will be employed.

Continued.....

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**Cyfarwyddwr, RCN Cymru/  
Director, RCN Wales**  
Helen Whyley

Mae'r RCN yn cynrychioli nrysys a nyrsio, gan hyrwyddo rhagoriaeth mewn arfer a llunio polisiau iechyd  
The RCN represents nurses and nursing, promotes excellence in practice and shapes health policies

**INVESTORS IN PEOPLE®**  
Rydym yn buddsoddi mewn llesiant Arian

Mae'r Coleg Nyrsio Brenhinol yn Goleg Brenhinol a sefydlwyd drwy Siarter Frenhinol ac Undeb Llafur Cofrestri Arbennig a sefydlwyd a dan Ddeddf Undebau Llafur (Cydgrynhoi) 1992.

The RCN is a Royal College set up by Royal Charter and a Special Register Trade Union established under the Trade Union and Labour Relations (Consolidation) Act 1992.

I therefore ask the Committee to explore recommending, as part of your forthcoming report, that the Health and Social Services Minister considers extending section 25B of the Nurse Staffing Levels (Wales) Act 2016 to include all areas in which registered nursing associates will be employed both in and outside of the NHS.

For ease of reference, I have attached a separate letter and briefing that I sent to the Health and Social Care Committee on 31st January, which include further information on the nursing associate role.

I look forward to reading the Committee's forthcoming report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Helen Whyley', written in a cursive style.

**HELEN WHYLEY, RN, MA  
DIRECTOR, RCN WALES**

**Encs.**