Council of Deans of Health Response to NMC Consultation on Completion Time Limits for Nursing and Midwifery Education and Training

12 March 2015

The Council of Deans of Health

The Council of Deans of Health (CoDH) is the representative voice of all 85 UK university health faculties engaged in education and research for nursing, midwifery and the allied health professions. Further information about us can be read at: http://www.councilofdeans.org.uk/. We welcome the opportunity to respond to this consultation.

Consultation questions

Q1. How far do you agree or disagree with the proposed changes to the NMC’s standards for the training and education of nurses and midwives?

Our members have mixed views on the proposals, complicated by the need to distinguish between the benefits of time limits per se (whether set by the regulator or by the institution) and the specific role of the NMC in setting the timeframe.

The principle of a time limit (whether institutional or set by the regulator)

Benefits

- Fast changing practice – students are likely to become out of date if allowed to take unlimited time to complete the course.
- Time limits provide a useful framework in which to discuss and resolve individual student circumstances.
- Sets clear expectations for students

Disadvantages

- Lack of flexibility to deal with some students’ exceptional circumstances.
- Sometimes used as a proxy means of dealing with poor academic and practice performance.
There is strong case for the benefit of maximum completion times for higher education programmes, borne out by the fact that universities generally have time limits for programmes. However, the question remains as to whether this responsibility is more appropriately held by the UK regulator or by the institution.

**Pros and cons of removing NMC involvement in setting a time limit**

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<th>Benefits</th>
<th>Disadvantages</th>
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<td>• Consistent with other regulators</td>
<td>• May introduce inconsistency between HEIs (therefore may undermine equality principle for students)</td>
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<td>• Gives HEIs flexibility to respond to individual student circumstances</td>
<td>• May precipitate ‘back door’ time limit control by education commissioners through bursary and fee payments</td>
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<td>• May result in lack of clarity for students and challenges to HEI policies</td>
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Changing the NMC’s role in this context will require trade-offs between different principles: in particular, consistency with other regulators and flexibility for HEIs with the risk of inconsistency across the sector and unintended consequences through using funding as a way of enforcing completion time limits below the current maximums.

Given that the argument is finely balanced, the NMC may wish to consider wording that would give HEIs flexibility in exceptional circumstances, while still retaining the expectation that the vast majority of students will complete within the current timescales.

If NMC Council does decide to devolve responsibility fully to universities, we suggest that:

• The change should not be applied retrospectively to students.
• There will need to be a clear communication plan to ensure that students are aware of the change and the devolution of responsibility to universities; this communication plan would also need to be include mentors and other stakeholders.
• An evaluation of the change should be built into the NMC education work programme, so that any unintended or negative consequences can be identified and mitigated.
Q2. How far do you agree or disagree that the proposed changes will not impact public protection?

The proposals would not alter the continuing requirement that a student’s entry to the register will depend on them successfully meeting all NMC requirements and the completion of the full educational programme. However, if the limit is removed, students could be taking much longer to complete and therefore there is a risk that their knowledge is out of date on completion of the programme. This could be a risk to quality of care and therefore the protection of the public.

Q3. How far do you agree or disagree that the proposed approach strikes an appropriate balance between the NMC’s responsibilities to ensure public protection while ensuring equality and fairness (as laid out in equalities legislation)?

We are uncertain to what extent removing the maximum completion time limits from NMC standards would ensure equality and fairness for students who need to extend their period of study due to unforeseen events. The proposals would give students and HEIs greater flexibility and would be more consistent with other healthcare students, which we would support.

Devolving responsibly for management of completion timescales to HEIs may result in HEIs taking different approaches and applying different time limits. A student studying at an HEI may perceive they have been disadvantaged if their HEI has an approach that is considered to be less flexible to another HEI. The implication of this is that students across the UK might have variable experiences and therefore may not have an equitable experience.

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