

RCN response to the draft Specialist Clinical Practitioner apprenticeship standard

Overall comments

We welcome the opportunity to comment on this proposal. We submit these overarching comments in addition to our submission on the Skills for Health website.

There is no overarching workforce strategy in England

The RCN supports apprenticeships as a route to increase the numbers of nursing staff. Getting the right skill mix in health and care settings is essential and there are a range of roles to play in staffing for safe and effective care. There are currently at least 40,000 nursing vacancies in health and care in England. The Government has committed to 50,000 more registered nurses in the NHS in England by the end of this Parliament and apprenticeships were also identified as a priority in both the NHS Long Term Plan and the Interim People Plan.

Nursing support roles are a valued part of the nursing staff skill mix. However, each role has a distinct scope of practice and support workers including nursing associates should never be seen as a substitute for registered nurses. There is currently no workforce strategy in England that models current and future patient need and future workforce. There should be a fully costed and fully funded workforce strategy covering all parts of the health and care workforce in each country of the UK. Workforce strategies must include overall supply, as well as staffing levels, skill mix and professional education.

The purpose and scope of practice of this new role is unclear

We are concerned that the proposed apprenticeship standard does not sit within a broader skill mix strategy. There are a number of specific points to address here:

- There is an evident potential for this new standard to be a steppingstone towards enhanced practice. However, this proposed standard appears to describe equipping an individual to be a specialist, rather than as a first step on their career journey within a specialism. Further clarification is needed on the use of the term 'specialist'. Specialist practice is not a level of practice itself as practitioners including nurses who are specialist can practice across a range of levels.
- Enhanced level of practice has not yet been clearly defined and there is no national framework.
- The standard consistently uses the term 'occupation' without properly defining the term.
- It is unclear exactly whom this standard is for as the standard lists more than 13 different titles. Is this standard for those who are already regulated professionals to specialise within their profession or development of a new profession?
- Entry requirements; is this following an existing route into a profession or a drive for direct entry?
- The accountability between the specialist clinical practitioner and the rest of the healthcare team is unclear.
- While the role is at Level 6, it is unclear how this relates to the expected education and professional background of apprentices or the education programme(s) to be completed.

Finally, we do not believe that the scope of practice is clear. There is no mention of the role of the professional regulator, the NMC, and the proposed standard contains numerous references to practice such as diagnoses and management of complex patients that we believe would be inappropriate at this level. There is wording used across this standard that would be used to describe practitioners working autonomously at advanced level.

About the RCN:

The Royal College of Nursing is the largest trade union and professional body representing 450,000 nursing staff across the UK.

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