



Coleg Nyrso Brenhinol
Cymru
Royal College of Nursing
Wales

Progress and Challenge in delivering safe and effective care 2023

How NHS Wales has
implemented the Nurse Staffing
Levels (Wales) Act 2016

November 2023



SAFE STAFFING SAVES LIVES

MAE STAFFIO DIOGEL YN ACHUB BYWYDAU

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Glossary

nurse or registered nurse: both refer exclusively to someone with a live registration on Sub Parts 1 or 2 of the Nursing and Midwifery Council register. Since 2004 all pre-registration nursing education has been delivered at undergraduate level in Wales.

health care support worker (HCSW): an umbrella term covering a variety of health and care support roles. HCSWs deliver nursing care delegated by, and/or under the supervision of, a registered nurse.

nursing staff: refers to *both* registered nurses and HCSWs. It is a more inclusive term than “nurse”, “registered nurse”, or “health care support worker”, as HCSWs delivering nursing care are part of the nursing family.

section 25B ward: a ward to which Section 25B of the *Nurse Staffing Levels (Wales) Act 2016* applies.

nurse staffing level: in the context of the *Nurse Staffing Levels (Wales) Act 2016*, the nurse staffing level is a figure that is calculated every six months for wards covered by Section 25B of that Act. The nurse staffing level is the required establishment and the planned roster setting out how many nurses and HCSWs a given ward needs.

establishment/required establishment: The total number of staff to provide sufficient resource to deploy a planned roster that will enable nurses to provide care to patients which meets all reasonable requirements in the relevant situation.

planned roster: the number of nurses scheduled to work on a shift.

patient acuity: a measure of the intensity of the patient’s nursing needs.

post-registration education: Any nursing education a registered nurse completes after initial registration with the Nursing and Midwifery Council.

safe and effective: minimising risks to patients and maximising the opportunities for their best possible outcome. Ensuring the patient is surrounded by the right number of nursing staff with the right mix of skills is essential to delivering safe and effective care.

Agenda for Change (AfC): a pay and job evaluation system used in the National Health Service across the UK to determine the pay scales and job classification for all NHS roles except medical and dental. Actual AfC terms and conditions and pay scales are set by the devolved governments of each constituent nation of the UK.

band X (e.g. “band 5 nurse”): refers to an NHS employee’s pay band in the Agenda for Change system. Registered nurses begin their careers at band 5.

Executive Summary

In seven years, the *Nurse Staffing Levels (Wales) Act 2016* has:

Increased the number of nurses on wards, making patients safer.

As a direct result of the *Nurse Staffing Levels (Wales) Act 2016*, the Welsh Government and NHS bodies have improved patient safety by investing in tackling low nurse staffing levels.

Made patient safety everyone's responsibility. The law gives nurses' professional judgement a formal role in calculating how many nurses and health care support workers are needed on certain wards. It also gives health boards a duty to maintain staffing at that level. With patient safety now a corporate responsibility, senior NHS management better understand how nurses' critical judgement and analysis keep patients safe.

Prompted health boards and Welsh Government to aim for better patient care. The law has shone a spotlight on the recruitment and retention of registered nurses. The Welsh Government is now acting on retention, having published a national nurse retention plan in September 2023. It must now drive the implementation of the plan in full.

Helped to make sure avoidable harm is reduced. Patient incidents and complaints about nursing care can happen. But when this happens on Section 25B wards, a failure to maintain nurse staffing levels is rarely considered a contributing factor.

Improved shift-by-shift data on nurse staffing. Health boards have agreed to implement a national shift allocating IT system, SafeCare, by November 2023. This is a significant step forward to ensuring compliance with the *Nurse Staffing Levels (Wales) Act 2016*.

Prompted spending to keep patients safe, even in a tough financial climate. Public bodies want to provide safe and effective patient care. Their duties under the *Nurse Staffing Levels (Wales) Act 2016* make it clear why spending on nurse staffing levels is an investment in patient safety.

Recommendations to improve patient safety

The Welsh Government should:

Develop statutory and operational guidance for Section 25A of the Nurse Staffing Level (Wales) Act 2016.

Articulate clear consequences for noncompliance with Sections 25B and 25C, updating the statutory guidance if necessary. The NHS Wales Escalation and Intervention Arrangements should explicitly refer to Sections 25B and 25C.

Ensure Health Inspectorate Wales (HIW) and Care Inspectorate Wales (CIW) inspect and report against compliance with the *Nurse Staffing Levels (Wales) Act 2016* in settings where they have a statutory responsibility to regulate and inspect.

Outline a timeline for the extension of Section 25B of the *Nurse Staffing Levels (Wales) Act 2016* to mental health inpatient wards and community settings, and build on the existing evidence to extend Section 25B to other settings.

Develop a national strategy for Health Education and Improvement Wales (HEIW) to commission post-registration education for registered nurses in Wales, and work with higher education institutions to deliver it. Only a national strategy can create the sustainable supply of advanced, specialist and consultant nurses that can meet the needs of the population.

Health boards should:

Invest in nursing retention and recruitment activities, fully committing to delivering the HEIW nurse retention plan published in September 2023.

Implement SafeCare within the agreed timeframe and publish day-to-day shift data in their Nurse Staffing Levels (Wales) Act 2016 annual assurance papers.

Prepare for the extension of Section 25B to mental health and community nursing.

Ensure compliance with their duties on informing patients of the nurse staffing level on each ward where Section 25B applies, including doing so in such a way that it is easily visible to anyone attending the ward.

Methodology

This report is the third Royal College of Nursing (RCN) Wales report examining the implementation of the *Nurse Staffing Levels (Wales) Act 2016*. The first report was published in November 2019¹, and second in 2022². This report focuses primarily on 2022-2023.

This report aims to:

- Provide an overview of how the implementation of the *Nurse Staffing Levels (Wales) Act 2016* is progressing based on each health board's own assessment.
- Recognise and encourage good practice.
- Show what needs to be done to implement the *Nurse Staffing Levels (Wales) Act 2016* consistently and effectively to protect patient care.

To compile this report, RCN Wales has:

- Written to all health boards and the Chief Nursing Officer (CNO) for Wales to ask how they are progressing in implementing the *Nurse Staffing Levels (Wales) Act 2016*.
- Asked RCN Wales representatives to complete an audit of Section 25B wards to check information on the number of nursing staff is displayed.
- Provided health boards with an advance copy of this report with an opportunity for them to provide additional input.

This report follows the format of the previous two reports in having a detailed section on each health board and a section outlining the national themes and actions required from the Welsh Government to support the implementation of the legislation. The original 2019 report chose not to include in its scope specialist provision such as Velindre University NHS Trust, which provides the Welsh Blood Service and Velindre Cancer Centre, or the Welsh Ambulance Services NHS Trust. Nursing services are an essential part of all health and social care services and an excellent case could be made for examining the Act in primary care, public health services, care homes, and commissioned social care. For the next edition of *Progress and Challenge*, intended for publication in 2025, the scope of the report will be considered.

¹ Royal College of Nursing Wales. (2019). *Progress and Challenge: The Implementation of the Nurse Staffing Levels (Wales) Act 2016*. <https://www.rcn.org.uk/Professional-Development/publications/009-905>

² Royal College of Nursing Wales. (2022). *Progress and Challenge in Delivering Safe and Effective Care: How NHS Wales has Implemented the Nurse Staffing Levels (Wales) Act 2016*. <https://www.rcn.org.uk/Professional-Development/publications/progress-and-challenge-in-delivering-safe-and-effective-care-2022-uk-pub-010-2>
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What is the Nurse Staffing Levels (Wales) Act 2016?

The *Nurse Staffing Levels (Wales) Act 2016* has five sections which combine to make nursing care safer in Wales.

- Section 25A** applies everywhere NHS Wales provides nursing services, or commissions someone else to do so. It requires health boards and trusts to “have regard to the importance of providing sufficient nurses to allow the nurses time to care for patients sensitively”.
- Section 25B** requires health boards to calculate and take “reasonable steps” to maintain the nurse staffing level in all wards where it applies. At first, it applied in adult acute medical and surgical wards. It was extended to children’s wards in 2021. Patients must also be informed of the nurse staffing level on each Section 25B ward.
- Section 25C** requires health boards to use a specific method to calculate the nurse staffing level for any ward covered by Section 25B.
- Section 25D** requires the Welsh Government to issue guidance to help organisations comply with their duties under Sections 25B and 25C. Health boards and trusts must use this guidance.
- Section 25E** requires health boards to report for 25B wards on the extent to which nurse staffing levels have been maintained, the impact the board or Trust considers that not maintaining nurse staffing levels has had on care provided to patients by nurses, and any actions taken in response to not maintaining nurse staffing levels.

Why is this so important?

The *Nurse Staffing Levels (Wales) Act 2016* protects patients.

The Francis Report (2013), the Keogh review (2013), the Berwick review (2013) and the Andrews Report (2014) all revealed patient tragedies that resulted from a repeated failure of the NHS to sufficiently prioritise patient safety and the quality of care by providing enough nurses.

The Francis report (2013) was the fifth official report into the tragedy that unfolded at Stafford Hospital, a small district general hospital in Staffordshire. It has been suggested that between 400 and 1,200 patients died as a result of poor care between January 2005 and March 2009.³ One of the report’s key findings was that there were “unacceptable delays in addressing the issue of a shortage of skilled nursing staff”.⁴ These reports are all referenced in the Act’s explanatory notes.⁵

³ Campbell, D. (2013, February 6). Mid Staffs Hospital Scandal: The Essential Guide. *The Guardian*. <https://www.theguardian.com/society/2013/feb/06/mid-staffs-hospital-scandal-guide>

⁴ Mid Staffordshire NHS Foundation Trust Public Inquiry. (2013). *Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry: Executive summary (HC 947)*. The Stationery Office. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/279124/0947.pdf

⁵ Explanatory notes to the Nurse Staffing Levels (Wales) Act 2016, paras 14-22. <https://www.legislation.gov.uk/anaw/2016/5/notes>

Research has shown that low nurse staffing levels can increase patient mortality by up to 26% compared to better staffed wards. In contrast, safe and effective nurse staffing levels reduce readmissions, health care associated infection rates, medication errors, falls, and pressure ulcers. They mean better hydration, better nutrition, and better communication with patients.⁶

In 2021, Aiken and colleagues⁷ found that patients were more likely to experience adverse conditions in hospitals where nurses had a high patient ratio, compared to hospitals where nurses had a lower patient ratio. These included a 41% higher chance of dying, 20% higher chance of being readmitted, and 41% chance of staying longer.

As well as ensuring there are enough nurses, the right skill mix of nursing staff is also important. Every 10% increase in the number of degree educated nurses within a hospital is associated with a 7% decline in patient mortality.⁸ A mix of registered nurses and healthcare support workers is needed to ensure an effective team.

RCN Wales members campaigned for the *Nurse Staffing Levels (Wales) Act 2016* due to the overwhelming evidence that supports the connection between nurse staffing levels and patient safety. RCN Wales continues to champion this approach.

⁶ 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>

⁷ Aiken, L.H. et al. (2021). Hospital nurse staffing and patient outcomes in Chile: a multilevel cross-sectional study. *The Lancet Global Health*. 9(8), 1145-1153. [https://doi.org/10.1016/s2214-109x\(21\)00209-6](https://doi.org/10.1016/s2214-109x(21)00209-6)

⁸ Rafferty, A.M. et al. (2014). Nurse staffing and education and hospital mortality in nine European countries: a retrospective observational study. *The Lancet*, 383(9931),1824-1830. [https://doi.org/10.1016/S0140-6736\(13\)62631-8](https://doi.org/10.1016/S0140-6736(13)62631-8)

Section 1: National Themes

Section 25A has improved patient safety, but its effectiveness is hindered by the absence of guidance

Section 25A of the *Nurse Staffing Levels (Wales) Act 2016* gives health boards and trusts a general duty to “**have regard to the importance of providing sufficient nurses to allow the nurses time to care for patients sensitively**”. It applies to *all* nursing services provided by the health board or trust – including those commissioned from other providers.

This overarching duty has led to good things:

- **Patients have been protected.** Senior NHS Wales management, Welsh Government officials, and Members of the Senedd alike recognise the value of nursing, its influence on patient mortality, and the need for investment in the profession.
- **Nurses are being consulted on patient safety.** The value of nurses’ professional judgement, and its importance in maintaining nurse staffing levels which permit safe and effective care, is more widely recognised. Senior health board members understand more clearly the significant role of the ward manager in ensuring best patient care.

However, no guidance exists on how health boards and trusts should comply with Section 25A. Before the *Nurse Staffing Levels (Wales) Act 2016* was passed, RCN Wales called for statutory guidance for the entire Act. The Welsh Government determined guidance was only necessary for Sections 25B and 25C.

Evidence of compliance with Section 25A is sparse, and consequences for noncompliance are few. As the nursing workforce continues to face challenges in both recruitment and retention, the ambitions of Section 25A remain largely unmet.

One of few health boards to report on its compliance with Section 25A is Cardiff and Vale University Health Board. Board papers show that after nurse staffing levels in its mental health wards did not comply with Section 25A in both 2019 and 2020, the matter was the focus of board discussion. In its 2021-22 Integrated Medium Term Plan, the board tasked staff with addressing gaps in nurse staffing and financing on these wards. By 2022, the executive director of nursing was able to sign off the staffing levels as compliant. This is a positive example of how the existence of a statutory duty to provide safe nursing care reinforced corporate accountability and ensured steps were taken to protect patients.

Hywel Dda University Health Board is another health board that provides detail on how it is delivering Section 25A. The health board refers to ongoing discussions regarding the realignment of budgets to ensure that the nurse staffing level is appropriate to meet patient need in its Emergency Department and “Front Door Services”.⁹ The health board has also comprehensively reviewed its critical care staffing levels to reflect the Faculty of Intensive Care Medicine’s Guidelines for the Provision of Intensive Care Services (GPICS).

However, further examples of corporate discussion and action on section 25A are difficult to find. There is also little information on how health boards apply Section 25A to services they commission from other providers, or on how – or whether – they check that those services are compliant.

⁹ Hywel Dda University Health Board. (2023). *Nurse Staffing Levels Annual Assurance Report*. <https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/board-agenda-and-papers-25-may-2023/board-agenda-and-papers-25-may-2023/item-6-1-nurse-staffing-levels-wales-act-annual-report-2022-23-pdf/>

The explanatory notes¹⁰ for the Act set out areas where this duty could be applied in practice, for example in the commissioning process and in workforce planning. Without clear guidance on how to ensure compliance, Section 25A is being weakly implemented even in these areas. RCN Wales reiterates the call to develop and implement statutory guidance for Section 25A.

RCN Wales understands from recent freedom of information requests that, in future, annual nurse staffing levels reports to each health board (“annual assurance reports”) will include a specific section on Section 25A. This is an important step in ensuring transparency and healthy scrutiny.

Section 25B is a powerful tool and has made children and adults in hospital safer

Section 25B requires health boards to calculate and take “reasonable steps” to maintain the nurse staffing level in all wards where it applies. It also requires health boards to inform patients of the nurse staffing level.

Where Section 25B applies, health boards budget for more nursing staff. In 2021, three years after Section 25B came into force, there were an extra 139.74 registered nurses and 597 more HCSWs – both Whole Time Equivalents (WTE) – being budgeted for by health boards across all adult acute medical and surgical wards.¹¹ After the Welsh Government extended Section 25B to paediatric wards in 2021, health boards actively recruited additional children’s nurses to ensure they could comply. Children in Welsh hospitals are now safer because health boards have more nurses on paediatric wards.

The Act sets out a formal role for the knowledge, analysis and critical judgement of nurses in calculating how many nurses and health care support workers are needed on certain wards. It establishes a duty for health boards to maintain staffing at that level. With nurse staffing levels informed by nurses themselves, and patient safety now a corporate responsibility, patients are safer.

Another positive effect has been on the way “uplift” is calculated. Uplift is an allowance to ensure wards do not find themselves understaffed because of inevitable staff absence (whether planned or not). Wards covered by Section 25B must all calculate their uplift in a standard way using a factor of 26.9% (agreed in 2011 by Nurse Directors in Wales as the evidence-based factor for use in Wales). Exceptions need to be reported to the CNO for Wales.

In implementing Section 25B, Wales has developed one of the largest databases on patient acuity and nurse staffing requirements in the UK and internationally: the Welsh Levels of Care. This evidence of the direct impact of nurses on patient care is vital for patient safety.

Improved patient safety indicators on wards covered by Section 25B

Certain types of incidents of harm to patients have been shown by research to correlate with low nurse staffing levels. The rate of these incidents is therefore regarded as a “quality indicator”. The statutory guidance underpinning the legislation specifies the following as quality indicators: patients developing a pressure ulcer, receiving the wrong medication and – on adult acute medical and surgical wards only – suffering falls. On paediatric wards, they also include infiltration/extravasation injuries. The guidance suggests that health boards consider patient experience too.

When such incidents occur on Section 25B wards, health boards must report it and determine whether low nurse staffing levels played a role.

¹⁰ Explanatory notes to the Nurse Staffing Levels (Wales) Act 2016, paras 14-22.
<https://www.legislation.gov.uk/anaw/2016/5/notes>

¹¹ Welsh Government. (2021). *Nurse Staffing Levels (Wales) Act 2016 – Statutory summary of nurse staffing level reports 2018-2021*. <https://www.gov.wales/sites/default/files/publications/2021-12/nurse-staffing-levels-wales-act-2016-statutory-summary-of-nurse-staffing-level-reports-2018-2021.pdf>

There is a risk that the information provided by health boards is incomplete or inaccurate for a variety of reasons. Having a mechanism at a health board and national level for assurance around patient safety and quality of care is important. The Welsh Government and the NHS should consider undertaking additional research into patient safety to provide improved data and suggestions for quality indicators.

However, from data published by health boards, incidents where a failure to maintain the nurse staffing level played a role appear to be rare. Of 2,708 such incidents reported on Section 25B wards between 2018 and 2023, a failure to maintain the nurse staffing level contributed to just 101 of these. That is 3.7% of the total.

The future is uncertain for the Welsh Government's existing work on extending Section 25B

The right of the Welsh Government to extend Section 25B of the *Nurse Staffing Levels (Wales) Act 2016* to new settings is part of the Act. RCN Wales has repeatedly called on the Welsh Government to exercise this right and extend it to mental health inpatient wards, district nursing, and health visiting.

Since its inception, the All Wales Nurse Staffing Programme – which sits within Health Education and Improvement Wales (HEIW) – has been developing the evidence needed to extend Section 25B of the *Nurse Staffing Levels (Wales) Act 2016* to community nursing and mental health inpatient wards.

Recent public meeting papers show health boards anticipating growth in nursing “over the next 3 years linked with ... the extension of *Nurse Staffing Levels (Wales) Act 2016* within Mental Health”.¹² However, the Welsh Government has paused the work of the All Wales Nurse Staffing Programme on extending Section 25B. What the future holds for this work is unclear.

Recent board papers also reveal that the Chief Nursing Officer agreed Interim Nurse Staffing Principles for both mental health nursing and health visiting as long ago as 2021.^{13, 14} At the time of writing in 2023, these interim principles have not been formally published. Even so, papers reveal that health boards including Hywel Dda University Health Board are already conducting impact assessments on meeting these unpublished principles. RCN Wales calls on the Welsh Government to formally publish these interim principles as, clearly, they are of great value in improving care.

RCN Wales continue to press for a timeline for the extension and for the Welsh Government to confirm its intentions for the future of the *Nurse Staffing Levels (Wales) Act 2016*.

¹² Aneurin Bevan University Health Board. (2023). *Board papers – 24th May 2023*.

<https://abuhb.nhs.wales/files/key-documents/public-board-meetings/abuhb-board-papers-24th-may-2023-final/>

¹³ Hywel Dda University Health Board. (2023). *Nurse Staffing Levels (Wales) Act Annual Report 2022-23*.

<https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/board-agenda-and-papers-25-may-2023/board-agenda-and-papers-25-may-2023/item-6-1-nurse-staffing-levels-wales-act-annual-report-2022-23-pdf/>

¹⁴ Hywel Dda University Health Board. (2022). *Nurse Staffing Levels (Wales) Act Annual Report 2021-22*.

hduhb.nhs.wales/about-us/your-health-board/board-meetings-2022/board-agenda-and-papers-26-may-2022/agenda-and-papers-26-may-2022/item-32-nurse-staffing-levels-wales-act-annual-report-2021-22pdf/

Nursing support roles are an essential part of the team but are a risk to patients if used as a substitute for registered nurses

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. Every 10% increase in the number of degree educated nurses within a hospital is associated with a 7% decline in patient mortality.¹⁵

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).

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:

“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**”¹⁶

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 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.

Investment in IT systems can make compliance and scrutiny easier

It was recognised during the passing of the *Nurse Staffing Levels (Wales) Act 2016* that collecting the large amount of real day-to-day shift data needed to calculate future nurse staffing levels accurately would be a challenge.¹⁷ At the time, no health board was running an IT system that could capture it, harvest it, and present it in a meaningful way.¹⁸ Allocate SafeCare (“SafeCare”) is a software package designed to do this.

¹⁵ Rafferty, A.M. et al. (2014). Nurse staffing and education and hospital mortality in nine European countries: a retrospective observational study. *The Lancet*, 383(9931),1824-1830. [https://doi.org/10.1016/S0140-6736\(13\)62631-8](https://doi.org/10.1016/S0140-6736(13)62631-8).

¹⁶ Welsh Government. (2021). *Nurse Staffing Levels (Wales) Act 2016: statutory guidance (version 2)*. <https://www.gov.wales/nurse-staffing-levels-wales-act-2016-statutory-guidance-version-2-html>

¹⁷ Welsh Government. (2021). *Nurse Staffing Levels (Wales) Act 2016 – Statutory summary of nurse staffing level reports 2018-2021*. <https://www.gov.wales/sites/default/files/publications/2021-12/nurse-staffing-levels-wales-act-2016-statutory-summary-of-nurse-staffing-level-reports-2018-2021.pdf>

¹⁸ Welsh Government. (2021). *Nurse Staffing Levels (Wales) Act 2016 – Statutory summary of nurse staffing level reports 2018-2021*. <https://www.gov.wales/sites/default/files/publications/2021-12/nurse-staffing-levels-wales-act-2016-statutory-summary-of-nurse-staffing-level-reports-2018-2021.pdf>

All health boards and trusts in Wales have committed to implementing SafeCare on their Section 25B wards by November 2023.

By making it easy for a health board to demonstrate the extent to which it complies with the *Nurse Staffing Levels (Wales) Act 2016*, SafeCare has the potential to dramatically increase transparency on how much of their time nurses spend with fewer colleagues on duty than they need to ensure patient safety.

The data available so far shows that between April 2022 and April 2023, staffing levels were inappropriately low on 42% of shifts on Section 25B wards at Hywel Dda University Health Board, and on 31% of such shifts at Betsi Cadwaladr University Health Board. In June 2022, 24% of shifts in Cardiff and Vale University Health Board fell into this category.

These numbers are concerning. While the availability of this data is a significant step forward and should be celebrated, there must also be action by health boards – supported by the Welsh Government – to address inappropriate staffing levels.

Health boards are at different stages of implementing SafeCare. Betsi Cadwaladr University Health Board is currently leading the way, with Hywel Dda and Cardiff and Vale University Health Boards close behind. In May 2023, Aneurin Bevan University Health Board reported having made “good progress” and expected completion in early July 2023.¹⁹ Cwm Taf Morgannwg University Health Board is working on a solution to a conflict of two IT platforms and has said SafeCare will be implemented across the health board by November 2023²⁰. Swansea Bay described the implementation as “ongoing” and on target to delivery in Summer 2023²¹.

Powys Teaching Health Board has no Section 25B wards on which to report data.

The nursing workforce faces critical challenges in Wales

The most significant challenge to implementing and complying with the *Nurse Staffing Levels (Wales) Act 2016* is the size of the nursing workforce.

Between March 2017 and March 2022, the nursing and midwifery workforce grew by 7%. However, this is relatively small when compared to the growth of other professional groups in the NHS. Over the same period, the number of medical and dental professionals increased by 23%. For allied health professionals, the figure is 28%.

Furthermore, patient acuity (the intensity of nursing care patients require) has also continued to grow, meaning more nurses are needed now than ever before.

Each year, RCN Wales publishes a statistical overview of the strengths and vulnerabilities of the nursing workforce. In this year’s edition, *Nursing in Numbers 2023*, we found that:

- There are **2,717** registered nurse vacancies across the seven health boards.
- Health boards’ collective spending on agency nursing increased from £133 million to **£161 million** in 2022/23.
- This could pay the salaries of **5,591** full-time newly qualified Band 5 nurses.
- NHS Wales spent a total of **£33.78 million** on nursing overtime.

¹⁹ Aneurin Bevan University Health Board. (2023). *Board papers – 24th May 2023*. abuhsb.nhs.wales/files/key-documents/public-board-meetings/abuhsb-board-papers-24th-may-2023-final/

²⁰ Cwm Taf Morgannwg University Health Board. (2023). *Annual Assurance Report on compliance with the Nurse Staffing Levels (Wales) Act*. ctmuhsb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/25-may-2023/5-6b-annex-a-annual-assurance-report-of-compliance-for-nsa-final-1-1-uhb-25-may-2023-pdf/

²¹ Swansea Bay University Health Board. (2023). *Annual Assurance 2022-23 report on compliance with the Nurse Staffing Levels (Wales) Act 2016*. sbuhsb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/

Health boards have all commented on the challenges they face in recruiting and retaining nurses, and are at various stages in developing plans to mitigate the pressure on their nursing workforces and keep patients safe. These are explored in Section 2 of this publication.

Survey of public information on Section 25B wards

Health boards have a duty to make information available to patients on each section 25B ward about the nurse staffing level, along with “Frequently Asked Questions” about the *Nurse Staffing Levels (Wales) Act 2016*. They must provide this information in Welsh and English.

This is clearly set out in the law itself under Section 25B and in its statutory guidance.²² The operational guidance includes templates which should make compliance easy.

In September 2023, RCN Wales members across the country surveyed twenty-nine Section 25B wards, covering four different health boards.

Twenty-two of these wards had information publicly available on staffing levels. Of those twenty-two wards, members described the information as “easy to find” on twenty. However, nine either did not include the date the staffing level had last been agreed by the board, or displayed a date that was over a year old.

On fourteen of the wards, members found the information in both English and Welsh.

However, out of all twenty-nine wards surveyed, only eight had FAQs about the *Nurse Staffing Levels (Wales) Act 2016* publicly available. Seven of these were in one health board.

Although this was a brief snapshot survey, these findings are concerning. Improving public transparency was a significant rationale for the passing of the Act. It is important that members of the public can be assured of health boards’ commitment to safe and effective care.

The RCN believes all health boards should take steps to ensure compliance with their duties on informing patients of the nurse staffing level on each Section 25B ward, including doing so in such a way that it is easily visible to anyone attending the ward.

²² Welsh Government. (2021). *Nurse Staffing Levels (Wales) Act 2016: statutory guidance (version 2)*. <https://www.gov.wales/nurse-staffing-levels-wales-act-2016-statutory-guidance-version-2-html>

Section 2: Health Board Reports

This section uses published board papers to look in more detail at health boards' progress in complying with the requirements of the *Nurse Staffing Levels (Wales) Act 2016* and the challenges they still face.

Aneurin Bevan University Health Board

Questions for Members of the Senedd to ask the Chief Executive of Aneurin Bevan University Health Board

1. Does the board receive a regular report on compliance with Section 25A of the *Nurse Staffing Levels (Wales) Act 2016*?
2. Is there clear public information on the nurse staffing levels on your Section 25B wards?
3. What impact has the Aneurin Bevan University Health Board Nursing, Midwifery and SCPHN Workforce Strategy had on reducing registered nurse vacancies?
4. What timescales are in place for the nursing retention actions Aneurin Bevan University Health Board is committed to?

Sustainability of the nursing workforce

Aneurin Bevan University Health Board's annual assurance report notes that there is a high registered nurse deficit. This could impact patient care.

Encouragingly, in addition to being involved in the development of the All Wales Nurse Retention Plan, the May 2023 papers show the board has developed its own "Nursing, Midwifery and SCPHN workforce strategy 2023-2026". In it, the board acknowledges its need for more nurses to ensure it can meet its duties under the *Nurse Staffing Levels (Wales) Act 2016* and rely less on temporary (i.e. agency) staff.²³

The strategy sets out a range of actions with timelines, including a recruitment plan by June 2023. It aims to improve retention by improving access to flexible working and by encouraging and supporting the use of self-rostering (June 2023 and September 2023 respectively). A formal approach to succession planning by October 2023 also features. There is an emphasis on routes into nursing and supporting new recruits during their first three months, on securing a fit-for-purpose education facility for nurses and midwives, and on opportunities for career progression to advanced nursing roles such as clinical nurse specialists and consultant nurses.

From the Strategy's approval in May 2023 until September, the board has seen an improvement in its concerning vacancy position. This is the result of recruitment of recently qualified nurses, 75 internationally educated nurses successfully obtaining their NMC PIN, and several agency nurses securing substantive positions. Regarding retention, the board has agreed retention metrics, is linking "retention cafés" to its induction programme, and is reviewing its exit questionnaire to better understand why people leave.

²³ Aneurin Bevan University Health Board. (2023). *Board papers – 24th May 2023*. <https://abuhb.nhs.wales/files/key-documents/public-board-meetings/abuhb-board-papers-24th-may-2023-final/>

The board has also established a “Future Nurse and Midwifery Academy” to support HCSWs at any career stage to develop professionally. The flexible “step-on, step-off” pathway offers a clear route for an HCSW to gain a nursing degree and become a registered nurse if they wish to. At the same time, the board is developing a pathway to recruit HCSWs from existing skilled volunteers.²⁴

All these positive steps could help retain registered nurses and are signs the board recognises the value of nursing in delivering safe patient care. The board should ensure the impact is evaluated and learning shared with other NHS Wales employers.

Recruitment for registered nursing and midwifery posts will focus on recruiting band 2 health care support workers as “the nurse or midwife of the future”.

Compliance with Sections 25A and 25B

The health board has recently publicly stated its intention to include in the annual assurance report a section on compliance with Section 25A. This is to be welcomed.

The board does have a number of internal processes and frameworks in place for monitoring its nurse staffing levels, including compliance with Section 25A. These include frameworks, escalation processes, and a weekly tracker and dashboard covering nurse staffing deficits (not limited to those under section 25B). A monthly report on compliance with the Act is presented to a Strategic Nursing Midwifery Workforce Meeting at which all fields of nursing are represented.

The board also uses the nurse staffing level re-calculation process in some areas outside Section 25B, including community hospital wards, assessment areas including emergency departments and elderly frail units, and critical care.

Unfortunately, public information on these processes and their impact on patient care is extremely limited. This makes it difficult to comment on the board’s work in these areas, despite the considerable amount of work this appears to represent. The board should consider recording and publishing the work in its formal board meetings, and whether conclusions or learning can be drawn from its work which could usefully inform practice and the All Wales Nurse Staffing Programme.

When certain kinds of serious incident occur on a ward covered by Section 25B of the *Nurse Staffing Levels (Wales) Act 2016*, health boards must record it, report it, and determine whether a failure to maintain nurse staffing levels was a contributing factor.

Between 2018 (when Section 25B came into force) and 2022, the board had no more than four incidents a year where low nurse staffing levels were thought to have contributed. However, 2022-23 saw twelve such incidents, though the overall number of serious incidents at the board fell.

The board has recently re-established a Quality Improvement Collaborative to eradicate all grade 3, 4, and unclassified healthcare acquired pressure ulcers.

²⁴ Aneurin Bevan University Health Board. (2023). *Board papers – 24th May 2023*. <https://abuhb.nhs.wales/files/key-documents/public-board-meetings/abuhb-board-papers-24th-may-2023-final/>

The risk of role substitution

Like other health boards, Aneurin Bevan University Health Board is expanding its use of “new and innovative ways of working to strengthen and stabilise the workforce”, or new nursing roles. While the board affirms its focus on “safe and effective delegation to improve patient safety and quality”²⁵ and appropriate delegation, it should be careful not to stray into substituting other staff for registered nurses.

The board’s own Nursing, Midwifery and SCPHN Workforce Strategy 2023-2026 board paper quotes recent modelling that anticipates a year-on-year rise in nursing vacancies in the board. The paper goes on to comment on the need to “direct the limited nursing workforce to roles that only nurses can undertake” while affirming that it plans to “develop and further expand band 3 and band 4 roles”.²⁶ This recognition that there are roles only registered nurses can undertake is reassuring from a patient safety perspective.

Keeping patients informed of the nurse staffing level

The board’s 2023 annual assurance report on compliance with the *Nurse Staffing Levels (Wales) Act 2016* mentions that following each six-monthly cycle, bilingual posters are displayed at the entrance of each ward which include the required establishment and the date this was presented to the board. The board has stated that as part of its rollout of ward accreditation, wards will be audited on information on staffing levels on display on all Section 25B wards. The results of these audits should be reported to the board.

²⁵ Aneurin Bevan University Health Board. (2023). *Board papers – 24th May 2023*. <https://abuhb.nhs.wales/files/key-documents/public-board-meetings/abuhb-board-papers-24th-may-2023-final/>

²⁶ Aneurin Bevan University Health Board. (2023). *Board papers – 24th May 2023*. <https://abuhb.nhs.wales/files/key-documents/public-board-meetings/abuhb-board-papers-24th-may-2023-final/>

Betsi Cadwaladr University Health Board

Questions for Members of the Senedd to ask the Chief Executive of Betsi Cadwaladr University Health Board

1. Does the board receive a regular report on compliance with Section 25A of the *Nurse Staffing Levels (Wales) Act 2016*?
2. Have your efforts to retain nursing staff led to any outcomes that can be replicated across Wales?
3. It appears the rollout of SafeCare has been very successful in Betsi Cadwaladr. Has the learning from this been shared with other health boards?
4. What are you doing to reduce cases of pressure damage on Section 25B wards in Ysbyty Gwynedd?
5. What are you doing to improve access to public information on the nurse staffing level on your Section 25B wards?

Sustainability of the nursing workforce

Information provided by the board shows it has enjoyed success in recruiting more nurses over the last four years. However, a simultaneous increase in patient acuity has meant that the health board's need for nursing staff has grown faster than it has been able to recruit.

Adding to the pressure, the numbers leaving are also large. In 2022, the WTE number of registered nurses recruited by the health board was 609.5, but 420.6 left. In 2023 we see a similar picture: 509.7 registered nurses joined, but 388.3 left.²⁷

The health board has a large number of registered nurse vacancies: 882.6 WTE in August 2023. This is more than twice as many as Swansea Bay, which had the next highest number of vacancies. RCN Wales is concerned that the number of vacancies could impact patient care.

To address the problem, over two years, the health board plans to recruit 380 WTE registered nurses internationally, of whom 80 will be registered mental health nurses. So far, the health board has recruited 58 WTE registered nurses under the programme.²⁸

A cadet programme at the health board offers school leavers a route into health with a level 2 (GCSE-level) qualification. The health board offers study leave and support for HCSWs to progress to band 4 Assistant Practitioner roles, and support to part-time routes into nursing with Bangor University, Wrexham Glyndŵr University, and the Open University. With the health board's support, a growing number of HCSWs have achieved level 5 and 6 qualifications, often associated with foundation degrees and degrees with honours respectively. This level of education would represent a path to becoming an assistant practitioner or registered nurse.

²⁷ Wood, A. (2023). *FOI response regarding implementation of the Nurse Staffing (Levels) Wales Act 2016* [Letter to Helen Whyley]. Betsi Cadwaladr University Health Board.

²⁸ Betsi Cadwaladr University Health Board. (2023). *Board papers – 25th May 2023*. <https://bcuhb.nhs.wales/about-us/health-board-meetings-and-members/health-board-meetings/25-5-23-agenda-bundle-public-vf2-compressed-n-v3-0/>

The board has welcomed the announcement of financial support to appoint a “Retention Lead” to oversee the initial implementation of the national nursing retention plan. It has also established its own range of programmes and roles in an effort to increase retention. These include a Nursing & Midwifery Workforce & Staffing Group to monitor its progress against retention plans, Pastoral Support Officers for all new nursing and midwifery staff, and a preceptorship programme specifically to support new graduates. A 24-month structured programme gives band 5 nurses the chance to enhance their careers through rotation, education and even “fast track” successful applicants to band 6 posts if they choose.

Despite this wide range of actions to retain nursing staff, board papers from May show the steps the board has taken to maintain its nurse staffing levels include cancelling study leave.²⁹ Understandably Betsi Cadwaladr University Health Board is trying to ensure safe patient care, but cancelling study leave should not be considered a “reasonable step”. This could potentially hinder a nurse’s progression and career advancement and ultimately their retention at the health board.

Compliance with Sections 25A and 25B

Nursing services provided by the health board that are not governed by Section 25B of the *Nurse Staffing Levels (Wales) Act 2016* are nonetheless subject to annual staffing reviews. The board is developing a standard operating procedure for nurse staffing level reviews and calculations, parts of which will apply to all nursing areas (both section 25A & 25B).

The May 2023 board papers affirm that in the past year, nurse staffing levels across the health board have been “calculated at a level which demonstrates the commitment to” the board’s duty under Section 25A of the *Nurse Staffing Levels (Wales) Act 2016*.³⁰ This is the duty to “have regard to the importance of providing sufficient nurses to allow time for the nurses to care for patients sensitively”.

With Betsi Cadwaladr University Health Board leading the way in implementing SafeCare daily staffing software, it is now possible to assess nurse staffing levels on its Section 25B wards on a shift-by-shift basis. This is excellent news for transparency and for patient safety. However, the picture painted by the data is concerning. Planned staff rosters on these wards were met with appropriate actual staffing levels just 22% of the time. In comparison, 31% of the time, planned rosters were not met, and staffing levels were deemed inappropriate. Looking specifically at paediatric wards, though, the former figure rises to 54%. Still, on 17% of paediatric ward shifts, planned rosters were not met, and staffing levels were deemed inappropriate.³¹

Since 2020/21 the number of falls, medication Never Events and nursing complaints on the board’s Section 25B wards have fallen, but a rising number of patients are suffering pressure damage. In the last four years, the number has risen steadily from 54 to 185. In addition, in each of last two years, 13 such cases were linked to nurse staffing levels, compared with none the year before. Over half of the incidents for 2022/23, and all those where a failure to maintain nurse staffing levels was considered a contributing factor for hospital acquired pressure damage, are from one hospital site: Ysbyty Gwynedd.

²⁹ Betsi Cadwaladr University Health Board. (2023). *Board papers – 25th May 2023*. <https://bcuhb.nhs.wales/about-us/health-board-meetings-and-members/health-board-meetings/25-5-23-agenda-bundle-public-vf2-compressed-n-v3-0/>

³⁰ Betsi Cadwaladr University Health Board. (2023). *Board papers – 25th May 2023*. <https://bcuhb.nhs.wales/about-us/health-board-meetings-and-members/health-board-meetings/25-5-23-agenda-bundle-public-vf2-compressed-n-v3-0/>

³¹ Betsi Cadwaladr University Health Board. (2023). *Board papers – 25th May 2023*. <https://bcuhb.nhs.wales/about-us/health-board-meetings-and-members/health-board-meetings/25-5-23-agenda-bundle-public-vf2-compressed-n-v3-0/>

The risk of role substitution

Betsi Cadwaladr University Health Board has said that operational teams apply their professional judgement to ensure that staffing levels, wherever possible, are maintained and where not possible, mitigated. The health board does not directly comment on role substitution beyond outlining mitigating actions when nurse staffing levels are not maintained on Section 25B wards. However, it does note that band 4 Assistant Practitioners are “undertaking extended duties on a competency assessed basis”.³²

Keeping patients informed of the nurse staffing level

The board has said that it keeps people informed of the nurse staffing level on Section 25B wards via information boards located at the entrance to each of the wards.³³

RCN Wales members surveyed fourteen Section 25B wards in September 2023 in Betsi Cadwaladr University Health Board. Of these fourteen, nine had information on the nurse staffing level publicly available. The five that did not were all found in Ysbyty Glan Clwyd.

None of the wards surveyed in the health board were able to produce an example of a patient information FAQ on the *Nurse Staffing Levels (Wales) Act 2016* in either English or Welsh.

³² Betsi Cadwaladr University Health Board. (2023). *Board papers – 25th May 2023*.

<https://bcuhb.nhs.wales/about-us/health-board-meetings-and-members/health-board-meetings/25-5-23-agenda-bundle-public-vf2-compressed-n-v3-0/>

³³ Wood, A. (2023). *FOI response regarding implementation of the Nurse Staffing (Levels) Wales Act 2016* [Letter to Helen Whyley]. Betsi Cadwaladr University Health Board.

Cardiff and Vale University Health Board

Questions for Members of the Senedd to ask the Chief Executive of Cardiff and Vale University Health Board

1. Does the board receive a regular report on compliance with Section 25A of the *Nurse Staffing Levels (Wales) Act 2016*?
2. Have your efforts to retain nursing staff led to any outcomes that can be replicated across Wales?
3. How are you using the data gathered by SafeCare to inform staffing levels?
4. Has your plan to end your use of agency HCSWs by April 2023 been successful?
5. What are you doing to improve access to public information on the nurse staffing level on your Section 25B wards?

Sustainability of the nursing workforce

Cardiff and Vale University Health Board has initiatives in place to help retain its registered nurses.³⁴ They include a “Career Clinic” to advise and support nurses to develop their careers without leaving the health board, and a “New Starter” survey in Autumn 2022 to help the board understand the experience of nurses as new employees, and how it might be improved.

The board has also developed a “retention toolkit”, though its actions are not nursing-specific. This is a weakness since the issues driving low retention of registered nurses, such as access to education and the frequently more attractive pay and working arrangements available from agencies, do require specific actions to address. It is also not clear what the board is doing to measure the success of these initiatives.

The board has developed a “Novice to Nurse” development pathway that supports HCSWs to become registered nurses.³⁵ There are also educational opportunities to support the implementation of Assistant Practitioners in nursing.

The board also set out a plan to target HCSWs who work for agencies and recruit them to the NHS’s internal “bank” of staff available for temporary shifts instead. Between May 2022 and January 2023, it recruited almost 400 HCSWs to the bank.

However, the board continues to struggle to recruit enough nursing staff. In June 2022, the board recorded vacancy rates of 11.26% across the registered nursing and midwifery staff groups, despite a 5% target. In July 2023, there were 314 WTE registered nurse vacancies across Cardiff and Vale University Health Board.

³⁴ Cardiff and Vale University Health Board. (2022). *People and Culture Plan 2022-25*. <https://cavuhb.nhs.wales/files/publications/people-and-culture-plan-2022-25/>

³⁵ Cardiff and Vale University Health Board. (2022). *People and Culture Plan – detailed actions*. <https://cavuhb.nhs.wales/files/board-and-committees/board-2022-23/71p-appendix-19-our-people-and-culture-plan-detailed-actionsdocx/>

Compliance with Sections 25A and 25B

The board is unusual in having used Section 25A, the general duty to provide “sufficient nurses to allow the nurses time to care sensitively for patients wherever nursing services are provided”, as a lever to improve nurse staffing levels. In doing so, it has made significant progress since 2021 with respect to nurse staffing levels in its inpatient mental health wards.³⁶

During 2019 and 2020, the Executive Nurse Director consistently brought it to the board’s attention that the nurse staffing levels in its mental health inpatient wards were not compliant with Section 25A. In 2021, the board directed its Mental Health Clinical Board Management Team to address gaps in nurse staffing on mental health inpatient wards, along with associated financial allocations, in their integrated medium term plan (IMTP) through 2021/2022.³⁷

By 2022, the Executive Nurse Director was able to sign off the nursing establishments required to care for patients sensitively across the Mental Health Clinical Board. To ensure these places stayed safe for patients, the Clinical Board undertook daily reviews and made use of underspends elsewhere in the Clinical Board, both redeploying their own staff and using temporary staff.

The number of incidents reported on Section 25B wards in Cardiff and Vale University Health Board fell sharply from 2018-19, the year the law came into force, to 2020-21. The fall in pressure damage incidents was particularly steep, from 94 to just 4. An overall rise since then has been driven at least in part by a change in the way incidents of pressure damage are recorded in 2022-23.

However, the board had six incidents of pressure damage in 2022-23 where a failure to maintain the nurse staffing level was determined to have played a role. That is more than any other year, and six times as many as in 2018-19.

The risk of role substitution

Cardiff and Vale University Health Board has made a temporary change to the establishment on Section 25B wards which could be interpreted as reducing its reliance on registered nurses in favour of HCSWs. The change increases the number of HCSWs on a permanent contract across the health board to “improve continuity of care for patients”.³⁸ The board says this will “improve patient experience through an increase in staff”.³⁹

Board papers show that this policy was implemented to address the risk of the organisation being unable to achieve planned rosters of nursing staff. However, the health board indicated neither an end date for the policy nor how widely it is in effect across the health board and its Section 25B wards. The policy should be used sparingly, with careful consideration and in discussion with ward managers, and should not be in place for an extended period of time.

Keeping patients informed of the nurse staffing level

In our snapshot survey, RCN Wales members visited three Section 25B wards in Cardiff and Vale University Health Board. All of the wards had information publicly available, although only one had this information bilingually. This ward also had FAQs available in English. At the time of the survey, no FAQs in Welsh were available in any of the wards.

³⁶ Welsh Government. (2021). *Nurse Staffing Levels (Wales) Act 2016: statutory guidance (version 2)*. <https://www.gov.wales/nurse-staffing-levels-wales-act-2016-statutory-guidance-version-2-html>

³⁷ Cardiff and Vale University Health Board. (2020). *Board papers – 26th November 2020*. <https://cavuhb.nhs.wales/files/board-and-committees/board-2020-21/26-11-2020-board-public-meeting-pdf/>

³⁸ Cardiff and Vale University Health Board. (2022). *Public board papers – 24th November 2022*. <https://cavuhb.nhs.wales/files/board-and-committees/board-2022-23/20221124-public-board-papers-v10pdf/>

³⁹ Cardiff and Vale University Health Board. (2022). *Public board papers – 24th November 2022*. <https://cavuhb.nhs.wales/files/board-and-committees/board-2022-23/20221124-public-board-papers-v10pdf/>

Cwm Taf Morgannwg University Health Board

Questions for Members of the Senedd to ask the Chief Executive of Cwm Taf Morgannwg University Health Board

1. Does the board receive a regular report on compliance with Section 25A of the *Nurse Staffing Levels (Wales) Act 2016*?
2. Is the board's nursing recruitment and retention plan published and what outcomes have there been from it?
3. How does the board assure itself that support staff are not expected to work outside their competencies as a result of the "temporary" uplift of HCSWs on Section 25B wards?
4. What are you doing to improve access to public information on the nurse staffing level on your Section 25B wards?

Sustainability of the nursing workforce

The board's 2022 annual nurse staffing level assurance report shows that a "temporary" increase in the number of HCSWs has been in place on many Section 25B wards, some since June 2021. One such ward needed additional staff to respond to a rise in patient acuity levels.⁴⁰ Others have faced challenges as more patients wait longer to transfer from hospital to other forms of care, such as care homes.⁴¹ Some of these patients are at a high risk of falls and need enhanced supervision. The result has been an increased use of a "temporary workforce of HCSW".⁴²

Temporary uplifts remain in place in 2023. The Head of Nursing requested a permanent funded uplift to the workforce, but in November 2022 the health board requested "further detailed scrutiny and analysis" from its Care Group Nurse Directors due to its "financial impact".⁴³ The same month, it was also reported that the Deputy Director of Nursing would undertake a detailed review of nurse staffing, including the board's enhanced supervision policies.⁴⁴ The outcome of this review, if it occurred, is unclear.

In its draft integrated medium term plan for 2023-26, the health board describes developing a model for workforce planning as a "key priority". The plan goes on to describe improving retention as a "key pillar" for its work and mentions an initial focus on band 5 Registered Nurses.⁴⁵

⁴⁰ Cwm Taf Morgannwg University Health Board. (2022). *Annual Presentation of Nurse Staffing Levels to the Board*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2022-board-papers/24-november-2022/53a-nslwa-report-uhb-24-november-2022pdf/>

⁴¹ Cwm Taf Morgannwg University Health Board. (2022). *Annual Presentation of Nurse Staffing Levels to the Board*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2022-board-papers/24-november-2022/53a-nslwa-report-uhb-24-november-2022pdf/>

⁴² Cwm Taf Morgannwg University Health Board. (2023). *Annual Assurance Report on compliance with the Nurse Staffing Levels (Wales) Act*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/25-may-2023/5-6b-annex-a-annual-assurance-report-of-compliance-for-nsa-final-1-1-uhb-25-may-2023-pdf/>

⁴³ Cwm Taf Morgannwg University Health Board. (2022). *Annual Presentation of Nurse Staffing Levels to the Board*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2022-board-papers/24-november-2022/53a-nslwa-report-uhb-24-november-2022pdf/>

⁴⁴ Cwm Taf Morgannwg University Health Board. (2022). *Annual Presentation of Nurse Staffing Levels to the Board*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2022-board-papers/24-november-2022/53b-appendix-a-november-annual-presentation-of-the-nurse-staffing-levels-to-1pdf/>

⁴⁵ Cwm Taf Morgannwg University Health Board. (2023). *Cwm Taf Morgannwg University Health Board Draft Three year Plan 2023-26*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/30-march-2023/52b-2023-26-three-year-plan-draft-uhb-30-march-2023pdf/>

The board's 2023 nurse staffing level annual assurance report refers to a "nursing recruitment and retention plan" which it goes on to say has been "revised to reflect the new challenges posed in terms of staff wellbeing".⁴⁶

It is clear from this that some work is under way to help retain nursing staff, but there is little public information on what these plans involve, how they will improve staff wellbeing, who will deliver them, or how they will be monitored.

The 2023 annual assurance report makes no mention of how the health board supports HCSWs to advance their careers. However, its draft integrated medium term plan for 2023-26 mentions "grow our own" schemes and apprenticeships.⁴⁷ These schemes and apprenticeships should be open to HCSWs.

Compliance with Sections 25A and 25B

Like most other health boards, Cwm Taf Morgannwg University Health Board does not comment on its compliance with Section 25A in its nurse staffing levels annual assurance report. However, its 2023-26 integrated medium term plan does state that a shortfall of 315 posts in its nursing workforce is causing a reliance on agency staffing which is "proven to be less safe and effective", draining finances, and hindering investment elsewhere.⁴⁸

Patient incidents involving a failure to maintain the nurse staffing level have remained extremely low since the introduction of Section 25B wards.

The risk of role substitution

There is no information regarding role substitution in either the board's 2022 or 2023 annual assurance reports.

While the board's "temporary uplift" policy described above appears to be a response to delays in hospital discharge and not a case of role substitution, it is important to consider the role of the registered nurse in supporting patients waiting to be transferred. The health board's Care Group Nurse Directors should consider whether the increase in patients requires an increase in registered nurses alongside HCSWs.

Keeping patients informed of the nurse staffing level

Board papers say that after the June 2022 bi-annual nurse staffing levels audit, all eligible wards in the health board were issued new templates to complete with nurse staffing level information and put on display. According to the board papers, patient information leaflets are "available", and information posters and Frequently Asked Questions leaflets explaining the *Nurse Staffing Levels (Wales) Act 2016* "can be provided".⁴⁹

In our snapshot survey, RCN Wales members visited five Section 25B wards in Cwm Taf University Health Board. Of those five wards, three had information on the nurse staffing level publicly available. However, of those three wards, only one was described as easy to find, and only one had the nurse staffing level information available in Welsh. At the time of the survey, none had FAQ leaflets available in any language.

⁴⁶ Cwm Taf Morgannwg University Health Board. (2023). *Annual Assurance Report on compliance with the Nurse Staffing Levels (Wales) Act*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/25-may-2023/5-6b-annex-a-annual-assurance-report-of-compliance-for-nsa-final-1-1-uhb-25-may-2023-pdf/>

⁴⁷ Cwm Taf Morgannwg University Health Board. (2023). *Cwm Taf Morgannwg University Health Board Draft Three year Plan 2023-26*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/30-march-2023/52b-2023-26-three-year-plan-draft-uhb-30-march-2023pdf/>

⁴⁸ Cwm Taf Morgannwg University Health Board. (2023). *Integrated Medium Term Plan 2023-2026 supporting paper*. <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/30-march-2023/52a-board-imtp-2023-26-supporting-paper-uhb-30-march-2023pdf/>

⁴⁹ <https://ctmuhb.nhs.wales/about-us/our-board/board-papers/2023-board-papers/25-may-2023/5-6b-annex-a-annual-assurance-report-of-compliance-for-nsa-final-1-1-uhb-25-may-2023-pdf/>

Hywel Dda University Health Board

Questions for Members of the Senedd to ask the Chief Executive of Hwel Dda University Health Board

1. It appears Hywel Dda has a good process of auditing the public information on Section 25B wards. Has this learning been shared across Wales?
2. What are findings of your assessments of staffing levels in mental health inpatient services, health visiting, and district nursing?
3. What impact have you seen from your nursing and midwifery strategic framework, “Empowered to Care”? How does it relate to your “nursing workforce stabilisation plan” and the new NHS Wales nurse retention plan?
4. The “Grow Your Own” apprenticeship programme appears to have been successful. Are there plans to expand this?

Sustainability of the nursing workforce

Hywel Dda University Health Board has initiatives in place to support retention of both early career and more experienced nurses. A five-year preceptorship programme supports newly qualified nurses to become experienced practitioners. Meanwhile, 37 ward managers have completed a leadership programme called STAR since its 2019 inception, with a further 17 commencing in 2023.

A Nurse Retention Group established by the board has co-developed a flexible working toolkit to help managers and staff overcome barriers to flexible working and holds focus groups with our international nurses to gather their experiences of joining the health board.

The board’s nurse staffing levels annual assurance reports mention the flexible working toolkit, but do not directly address retention.

The board offers a “Grow Your Own” programme for HCSWs to advance their careers by taking a part-time degree to enable them to become registered nurses. There are also opportunities for HCSWs to undertake work-based courses at level 2 and level 3 enabling them to learn whilst working

The health board launched a 5-year nursing and midwifery strategic framework, “Empowered to Care”, in November 2021. There is no public information on how the first two years of the framework have gone, or on any effects on retention and recruitment of nursing staff.

A number of board documents refer variously to a “nursing workforce stabilisation plan”, “nurse stabilisation programme”, and similar.⁵⁰ A health board submission to the Welsh Government mentions that “as part of the nurse stabilisation programme, Glangwili has seen a significant improvement within 25A and 25B wards [...] however, the expenditure has increased significantly as there remains a reliance on agency to achieve the nurse staffing fill rates on the respective wards”.⁵¹ The health board’s annual plan for 2023-24 refers to a planned rollout of the nurse stabilisation programme, beginning with Worthybush Hospital.⁵²

⁵⁰ Hywel Dda University Health Board. (2023). *Submission of supplementary information to Welsh Government on the 2023/24 Annual Plan*. <https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/extraordinary-board-may-31-2023/item-2-submission-of-supplementary-information-to-welsh-governm-ent-on-the-2023-24-annual-plan/>

⁵¹ Hywel Dda University Health Board. (2023). *Submission of supplementary information to Welsh Government on the 2023/24 Annual Plan*. <https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/extraordinary-board-may-31-2023/item-2-submission-of-supplementary-information-to-welsh-governm-ent-on-the-2023-24-annual-plan/>

⁵² Hywel Dda University Health Board. (2023). *Annual Plan 2023/24*. <https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/board-agenda-and-papers-30-march-2023/agenda-and-papers-30-marc-h-2023/item-32-appendix-2-hywel-dda-annual-plan-2023-24pdf/>

Despite this, there is no further information on the contents of the plan/programme. It would be beneficial for transparency if the health board were to set out what the nursing workforce stabilisation plan/programme involves, whether it is funded, and how it impacts the nursing profession.

Compliance with Sections 25A and 25B

Hywel Dda University Health Board is one of few health boards that provides detail on how it is delivering Section 25A and preparing for an extension of Section 25B to mental health inpatient services, health visiting and district nursing.

Board papers state that there are ongoing discussions regarding the realignment of budgets to ensure that the nurse staffing is appropriate to meet the current level of activity and acuity for Emergency Department and “Front Door Services”, as covered by Section 25A.⁵³ In addition, there has been a comprehensive review of the critical care staffing levels to reflect the Guidelines for the Provision of Intensive Care Services (GPICS) standards. At the time of writing, the health board is in the process of discussing the adjustments to the finance and workforce required to meet the standards.

The board carries out staffing reviews more frequently than required so that its staffing levels on Section 25B wards can be calculated in a more responsive way. To prepare for an extension of Section 25B to mental health inpatient wards, the board has also completed an assessment of nurse staffing levels in those wards in line with the NHS Wales Interim Mental Health Nurse Staffing principles. At the time of writing, the findings are with the board’s Director of Nursing, Quality & Patient Experience, and have yet to be published. The board has carried out a similar assessment in health visiting, and one is under way in its district nursing services.

Although the health board has reported a growing number of serious incidents on Section 25B wards since 2018, in particular complaints regarding nursing care, the number involving a failure to maintain the nurse staffing level has remained very low. No medication Never Events have ever been attributed to a failure to maintain nurse staffing levels, and in 2022-23 the board reported no incidents at all where a failure to maintain nurse staffing levels played a role.

Hywel Dda University Health Board has begun to report shift information through “SafeCare”, the daily staffing and shift analysis software which all health boards have committed to implement. This has been introduced for Section 25B wards.

From data gathered on adult acute medical and surgical wards, it is clear there is a challenge maintaining nurse staffing levels on Section 25B wards. Out of 23,920 shifts, planned rosters were met and staffing levels were appropriate less than half of the time (42.47%). On 42.45% of shifts, planned rosters were not met, and staffing levels were not appropriate. Compliance with staffing requirements was better on paediatric wards, where 69.39% of shifts saw appropriate staffing levels with planned rosters met.

⁵³ Hywel Dda University Health Board. (2023). *Nurse Staffing Levels Annual Assurance Report*. <https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/board-agenda-and-papers-25-may-2023/board-agenda-and-papers-25-may-2023/item-6-1-nurse-staffing-levels-wales-act-annual-report-2022-23-pdf/>

The risk of role substitution

Though Hywel Dda University Health Board is introducing new nursing roles, the board does not comment directly on role substitution.

In 2022, some teams introduced band 4 Assistant Practitioner roles, as well as other non-nursing professions, to support registered nurses. The board has highlighted the teams' enthusiasm about these new roles and that they are now exploring other roles, such as pharmacy technicians, housekeeping roles, procurement roles, and professional development roles, as part of the board's "team around the patient" model.

Keeping patients informed of the nurse staffing level

Impressively, compared with other health boards, Hywel Dda University Health Board has established processes to inform patients of the nurse staffing level. It conducted an assessment in March 2023 and found that 95% of its wards where Section 25B applied had up-to-date patient information displayed outside the entrance. Following the assessment, the outstanding information was provided to the single ward that did not have the most up-to-date information displayed.⁵⁴

In September 2023, RCN members surveyed seven Section 25B wards in Hywel Dda University Health Board and found all information on nurse staffing levels publicly available and up-to-date, including Frequently Asked Questions leaflets in English and Welsh.

⁵⁴ Hywel Dda University Health Board. (2023). *Nurse Staffing Levels Annual Assurance Report*. <https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2023/board-agenda-and-papers-25-may-2023/board-agenda-and-papers-25-may-2023/item-6-1-nurse-staffing-levels-wales-act-annual-report-2022-23-pdf/>

Powys Teaching Health Board

Questions for Members of the Senedd to ask the Chief Executive of Powys Teaching Health Board

1. What actions are you taking to retain nurses in Powys and what effects are these actions having?
2. Have you secured funding for the project with Bangor University and HEIW to improve the sustainability of the nursing workforce in Powys?
3. Have you evaluated the “Aspiring Nurse Programme”? Could learning be adopted across Wales?

Sustainability of the nursing workforce

Powys Teaching Health Board has been actively involved with the testing and piloting of the HEIW Nurse Retention Self-Assessment Tool. The Deputy Director of Nursing has represented Powys, and the Deputy Director of Nursing Group, on the All Wales Retention Nursing Workforce Group.

Career and progression support is on offer for HCSWs joining Powys Teaching Health Board, beginning at entry level through the apprenticeship academy, or by joining the health board at band 2-4 and taking advantage of support to complete an accredited Clinical Induction programme. From there, HCSWs can undertake qualifications at Levels 2, 3 or 4 depending on development needs. The board’s Aspiring Nurse Programme then offers a part-time, flexible route for HCSWs who want to become registered nurses. The programme consists of an internal pathway for existing HCSW employees of the health board, and an external pathway with availability reliant on additional funding. This is an excellent local initiative and the external pathway should be supported with Welsh Government funding.

Powys Teaching Health Board is also working on a new project with HEIW and Bangor University to enable trainees to undertake full-time nursing degree programmes whilst employed by Powys Teaching Health Board. This project is still being developed and is funding-dependent.

Compliance with Sections 25A and 25B

Powys Teaching Health Board has no wards covered by Section 25B of the *Nurse Staffing Levels (Wales) Act 2016*. Even so, the board has voluntarily adapted several of Section 25B's key principles. All wards in Powys are covered by Section 25A.

The board has introduced a designated person who is responsible for nurse staffing levels, mirroring the “designated person” to calculate nurse staffing levels on Section 25B wards. Its Executive Director of Nursing and Midwifery intends to deliver an annual report to the board and undertake twice-yearly reviews of its required number of nurses, to be reported to the executive management team. One such review was completed in October 2022 and, at the time of writing, another is under way.

The board also intends to introduce the Allocate SafeCare software in its adult in-patient wards, with a view to potentially extending it to the older adult mental health wards.

However, Powys Teaching Health Board continues to struggle with a registered nurse staffing deficit. Its corporate risk register has reflected this since 2017⁵⁵ and was last updated in September 2022, showing “failure to plan for, recruit and retain an appropriate workforce results in an inability to sustain high quality services”⁵⁶ is still a matter of concern for the board.

The risk register references the “particularly challenging” number of registered nurse vacancies, with an overall vacancy rate of 31%. In two community wards, the vacancy rate is at least 48%.⁵⁷ In July 2023 the registered nurse deficit was 119 WTE. The risk dashboard worryingly details “recent workforce projection data indicates an overall worsening picture for our workforce vacancy levels over the next 10 years”. This is concerning for the delivery of safe and effective care and allowing nurses time to care for patients sensitively.⁵⁸

The risk of role substitution

On the risk of role substitution, Powys Teaching Health Board says only that it is currently working with the Chief Nursing Officer for Wales to understand what band 4 clinical roles might offer in the future.

⁵⁵ Powys Teaching Health Board. (2022). *Board papers – 27th July 2022*. <https://pthb.nhs.wales/about-us/the-board/board-meeting-calendar/meeting-of-the-board-on-27-july-2022/1/>

⁵⁶ Powys Teaching Health Board. (2023). *Board papers – 29th March 2023*. <https://pthb.nhs.wales/about-us/the-board/board-meetings/2023/29-march-2023/agenda-and-papers-pack-2/>

⁵⁷ Powys Teaching Health Board. (2023). *Board papers – 25th January 2023*. <https://pthb.nhs.wales/about-us/the-board/board-meetings/2023/25-january-2023/agenda-and-papers1/>

⁵⁸ Powys Teaching Health Board. (2023). *Board papers – 25th January 2023*. <https://pthb.nhs.wales/about-us/the-board/board-meetings/2023/25-january-2023/agenda-and-papers1/>

Swansea Bay University Health Board

Questions for Members of the Senedd to ask the Chief Executive of Swansea Bay University Health Board

1. Does the board receive a regular report on compliance with Section 25A of the *Nurse Staffing Levels (Wales) Act 2016*?
2. To what extent are registered nurses and HCSWs expected to provide cleaning services on wards?
3. Have you developed any staff retention actions that are specific to registered nurses? If so, what are they?
4. What is your system for informing patients and visitors of the nurse staffing level on Section 25B wards? Has the effectiveness of that system improved for visitors since May 2023?

Sustainability of the nursing workforce

Swansea Bay University Health Board has an extensive registered nurse overseas recruitment programme. The board met a target of 350 offers in 2022/23 and is making plans to recruit a further 350 nurses in 2023/2024.⁵⁹ The board remarks that its successful recruitment of substantive staff has reduced its need for temporary staffing⁶⁰ with positive effects on morale and patient care.

The 2023 May board papers identify that the majority of 96 nurses recruited between March and May will be working on its wards from June, “firstly as a band 4 nurse”.⁶¹ This is a cause for major concern for the Royal College of Nursing, since all registered nurses should enter the workforce at Agenda for Change band 5. If an employee is not a registered nurse, they are a health care support worker. There is no such thing as a “band 4 nurse” or an “unregistered nurse”. Swansea Bay University Health Board need to correct the language used in its board papers as a matter of urgency to clarify the relationship to patient safety.

The health board has a HCSW Development Lead to advise HSCWs on development and educational opportunities. The board offers fully funded opportunities for progression from band 2 to bands 3 and 4, as well as opportunities to become a registered nurse.

The board has a Recruitment and Retention Development Group chaired by the Assistant Director of Workforce. Membership of the group includes senior nurses. Four workstreams to improve retention are in early stages of development, including flexible working, mentoring, and “thinking of leaving?” interviews.

⁵⁹ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuwb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

⁶⁰ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuwb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

⁶¹ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuwb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

Compliance with Sections 25A and 25B

The board's Monthly Nurse Staffing Act Steering Group discusses nurse staffing levels and risk assessments across the health board, but the group is currently reviewing its terms of reference.

The number of falls where nurse staffing levels were determined to have contributed has decreased significantly from 11 in the first reporting period (2018/2019) to 1 in the most recent.

The risk of role substitution

The board's May 2023 papers show that the cleaning of equipment such as beds, mattresses and patient lockers is currently carried out by registered nurses. The board has reviewed enabling cleaning staff to take on this role and reduce time spent by nurses on cleaning.⁶² It plans to roll this plan out across Morriston Hospital "in the first instance". This plan should be rolled out as a matter of urgency. It is appropriate to involve registered nurses or specialist infection prevention and control nurses in the training or supervision of cleaning duties. However, specialist cleaning staff should be employed in health care settings to provide cleaning services and it is concerning to hear that this is not the case.

The May 2023 *Nurse Staffing Levels (Wales) Act 2016* annual report mentions that the health board is reviewing its Nursing and Midwifery workforce and will "develop innovative roles" to support the service and meet the needs of our patients.⁶³ It goes on to say that due to registered nurse (band 5) vacancies, a "different approach" is needed to enhance the non-registered workforce.⁶⁴ Board papers from the same month add that staff are "looking at roles and tasks that can be delegated safely to a non-registrant".⁶⁵

It is important that registered nurses, specifically ward managers, are included in any discussions about what tasks a registered nurse can delegate "safely".

Keeping patients informed of the nurse staffing level

The health board's most recent annual assurance report on compliance with the *Nurse Staffing Levels (Wales) Act 2016* from April 2022 describes a process for keeping patients informed of the nurse staffing level on Section 25B wards by displaying a bilingual poster outside the ward entrance.⁶⁶

⁶² Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuhb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

⁶³ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuhb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

⁶⁴ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuhb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

⁶⁵ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuhb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>

⁶⁶ Swansea Bay University Health Board. (2023). *Nurse Staffing Levels (Wales) Act 2016 annual assurance report*. <https://sbuhb.nhs.wales/about-us/key-documents-folder/board-papers/health-board-may-2023/4-1-nurse-staffing-act-pdf/>



About the Royal College of Nursing

The Royal College of Nursing is the world's largest professional organisation and trade union for nursing, representing over 500,000 nurses, midwives, health visitors, healthcare support workers and nursing students, including over 29,500 members in Wales. RCN members work in both the independent sector and the NHS. Around two-thirds of our members are based in the community. The RCN is a UK-wide organisation, with National Boards in Wales, Scotland and Northern Ireland.

The RCN represents nurses and nursing, promotes excellence in nursing practice and shapes health and social care policy.

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