

**ROYAL COLLEGE OF NURSING RESPONSE TO
DEPARTMENT OF HEALTH CONSULTATION ON TRANSPOSITION OF THE
REVISED MUTUAL RECOGNITION OF PROFESSIONAL QUALIFICATIONS
DIRECTIVE**

The Royal College of Nursing has responded to a number of consultations in relation to the health aspects of the draft Professional Qualifications Directive during its adoption at European level and since then its implementation in the UK, including a specific consultation on language controls.. Our key responses are listed below:

2014 Response to European Commission consultation on the European Professional Card

https://www2.rcn.org.uk/support/consultations/responses/consultation_on_introducing_the_european_professional_card_epc_for_nurses_doctors_pharmacists_physiotherapists_engineers_mountain_guides_and_real_estate_agents

2014 Response to the Department for Business, Innovation and Skills on the directive

https://www2.rcn.org.uk/support/consultations/responses/mutual_recognition_of_professional_qualifications_revised_directive

2014 Response to Department of Health consultation on language controls

https://www2.rcn.org.uk/support/consultations/responses/language_controls_for_nurses_midwives_dentists_dental_care_professionals_pharmacists_and_pharmacy_technicians

This brief response will focus on any outstanding issues in relation to nursing and the implementing regulations.

Q1. Are there any further legislative amendments, other than those set out in the draft *European Qualifications (Health and Social Care Professions) Regulations 2015*, which you think are required as a result of the changes to the Directive?

The RCN has not identified any further required legislative amendments

Q2. Do you think that a pharmacist trainee should take their practical training during their course or at the end of their course?

N/A

Q3. Do you have any comments on any of the changes in the section above or, where applicable, how these have been inserted into the draft *European Qualifications (Health and Social Care Professions) Regulations 2015*?

N/A

Q4. Do you have any comments on the Department's draft *European Qualifications (Health and Social Care Professions) Regulations 2015* in relation to the EPC? Are there any further consequential amendments that you think need to be made?

We are not proposing any amendments to the regulations but see comments below.

Q5. Do you think there are any potential issues with the introduction of the EPC in relation to the health care professions that have been selected by the Commission?

It will be important to review the uptake of the virtual European Professional Card for nurses after a period of implementation as it introduces a new process and timescales for recognition.

Q6. Do you agree with the Department's interpretation of what should constitute an alert in relation to healthcare professionals?

The RCN would want clarity that an alert to other regulators would not be triggered if a registrant of the Nursing and Midwifery Council had briefly lapsed from registration for late payment of fees.

Q7. Do you think it would be helpful for the Department to provide healthcare specific guidance for the regulatory bodies to complement the BIS guidance?

Given the patient safety implications for health professions it is important to have specific guidance for this sector.

Q8. Is there anything that you would like us to include in healthcare specific guidance?

It would be useful to have more specific guidance in relation to "temporary and occasional" practice in a member state including a future review of whether this route to registration increases and the impact on language competency, since nurses using this route will self-declare and not be required to submit evidence to the NMC or take a test, unlike those using the permanent route!

Employers also need to be made aware of this difference if employing someone through this temporary route.

Q9. Are there any protected characteristics that you feel may be effected, either positively or negatively, by these changes?

None identified

Q10. Are there any potential monetary impacts (either positive or negative) that you think we need to be aware of?

We would anticipate some costs to the Nursing and Midwifery Council in implementing the new arrangements.

**Royal College of Nursing
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