



**RCN Policy and International Department  
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# Registration of overseas trained nurses in the UK

International comparisons and key issues for  
incoming nurses to ensure safe and effective  
practice

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## Introduction

International nurses and midwives have become an important part of the workforce in many western countries<sup>1</sup> and the United Kingdom (UK) has long benefited from their skills and expertise. In this context it is essential to ensure that overseas trained nurses (ONTs) meet host country standards for registration. This is particularly relevant in the changing context of care delivery in the UK and the increased emphasis on delivering patient-centred, coordinated care. The Nursing and Midwifery Council (NMC) is undertaking a review of its registration process to ensure it is 'robust, up to date, and able to assure the public that overseas trained nurses and midwives are capable of safe and effective practice before being admitted to the UK register'.<sup>2</sup>

NMC's consultation, *Overseas competency test for United Kingdom registration*, outlines proposals for competency testing for non-European Economic Area (EEA) trained nurses and midwives to include online theoretical testing components accompanied by clinical skills and performance assessment through OSCEs. There are two separate systems for assessing EU and non-EU trained nurses. This is due to regulatory systems in place under the EU directive.<sup>3</sup> The NMC consultation is only addressing registration of non-EU trained nurses.

Recognising there is a broader range of issues than online competency testing when assessing registration of overseas nurses, this briefing provides a discussion of the experiences and systems used in other countries that also have a heavy reliance on the intake of ONTs. The purpose is to give an overview of the key issues and reflect on the experiences of other countries, highlighting opportunities to learn from some of their challenges and successes.

## UK registration of overseas trained nurses

The NMC approves 25 *Overseas Nursing Programme* (ONP) programmes that include a period of supervised practice in practice placement settings. Requirements currently (2013) include 20 days of protected learning time and a period of supervised practice. The assessment is determined by the approved education institution (AEI) and subject to NMC quality assurance.<sup>4</sup> There is one approved adaptation to midwifery programme that is delivered against the standards for adaptation to midwifery in the UK (2007).<sup>5</sup> The ONP was introduced in 2005

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<sup>1</sup> Zizzo, K, Xu Y (2009) Post-Hire Transitional Programs for International Nurses: A Systematic Review, *The Journal of Continuing Education in Nursing*, 40(2), 57–64.

<sup>2</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration: consultation. Available at: <http://www.nmc-uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf> (accessed 12/12/13) (Web).

<sup>3</sup> The EU sets the minimum training standards that nurses responsible for general care (adult nursing in the UK) and midwives must meet in order to be eligible to register and practise in their home member state and across the EU. These standards are set out in Directive 2005/36/EC on the Recognition of Professional Qualifications.

<sup>4</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration: consultation. Available at: <http://www.nmc-uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf> (accessed 12/12/13) (Web).

following a detailed consultation review process in 2004. This was mainly as a result of inconsistencies developing in how NMC's requirements were being applied.<sup>6</sup> The 2004 review largely concentrated on agreeing to national standards to encourage consistency across the UK. At the time of the previous review, around 90 per cent of respondents agreed to two integrated parts: a supervised practice period; and a study programme.<sup>7</sup>

There is limited evidence to the effectiveness or otherwise of the current ONP system and it is not clear that NMC has taken any extensive review. The 2013 consultation<sup>8</sup> is specifically for the introduction of a (online) test of competence for overseas applicants to the UK register. An understanding of the broader context and related issues is important and necessary to ensure an evidence-based and effective system is in place.

### **NMC consultation on overseas competency test**

NMC's 2013 consultation outlines proposals for the ONP and Adaptation to Midwifery programmes to be replaced by a 'single holistic process with a flexible competency test at its core':

*'These assessments would be undertaken by all overseas trained nurses and midwives once they have proven that they have met registration and education requirements and have demonstrated the required language competence in English ... the assumption underpinning a competency test is that it demonstrates an individual nurse or midwife's suitability to register. Whilst the test will assess the applicant's understanding of nursing or midwife practice in the UK healthcare context, the employer is still required to satisfy themselves that the individual is safe and effective in the role in which they are employed, following an induction period'.<sup>9</sup>*

The proposed assessment would consist of online theoretical components accompanied by clinical skills and performance assessment through the use of objective structured clinical examinations (OCSEs).<sup>10</sup> A second option has also been put forward that would include a period of supervised practice in addition to the online test and OCSE. The practice of using competency based testing and OCSEs is common for other health practitioners, such as doctors and dentists.

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<sup>5</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration: Consultation. Available at: <http://www.nmc-uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf> (accessed 12/12/13) (Web).

<sup>6</sup> NMC (2004) NMC consultation on Overseas nursing programme for UK registration. Available at: <http://www.nmc-uk.org/Documents/Consultations/NMC%20Consultation%20-%20overseas%20nurses%20programme%20-%20final%20report.pdf> (accessed 13/12/13) (Web).

<sup>7</sup> Ibid.

<sup>8</sup> The NMC is undertaking a review of its registration process for non-European Economic Area (EEA) (overseas) trained nurses and midwives.

<sup>9</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration:

Consultation. Available at: <http://www.nmc-uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf> (accessed 12/12/13) (Web).

<sup>10</sup> Ibid.

The Royal College of Nursing (RCN) submitted its response to this consultation and acknowledges there is further work that needs to be undertaken to fully develop the proposal; and that there are additional issues for consideration to ensure a robust system of registration.

## **International comparisons**

The UK, Australia, Canada and the United States (US) are leading host countries for internationally educated nurses.<sup>11</sup> As New Zealand shares similar regulatory mechanisms to Australia it is also often reviewed in the same context.<sup>12</sup> As such, an assessment of the process for registration of overseas nurses in these countries provides a useful comparison of methods used and issues involved, as well as highlighting where lessons could be taken from their experiences.

While systems vary across countries, common to most is that the incoming nurse is expected to meet a set of minimum standards, such as visa permissions, education qualifications and language proficiency. Whether these checks are formalised or regulated differs between countries and states. Table 1 provides a summary of some of the requirements for the registration of overseas nurses across these countries.

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<sup>11</sup> Xu Y (2012) *Transition Programs for Internationally Educated Nurses, What can the United States learn from the United Kingdom, Australia and Canada?*, Nurs Econ. 30(4):215-223.

<sup>12</sup> Ibid.

**Table 1: Comparison of registration processes for overseas trained nurses**

Country	Current system for overseas nurse registration	Exam	English language proficiency test	Supervised clinical practice period or transition programme
United States	Most states require Commission on Graduates of Foreign Nursing Schools (CGFNS) pass first, then National Council Licensure Examination (NCLEX) computerised exam.	Yes	Yes	Some states offer it, but not part of registration.
Australia	Qualifications assessed by relevant authority against national standards. Must complete approved programme of study or bridging programme.	No	Yes	Depends on state, in some cases it is a requirement for registration.  It is common for employers to provide a 'bridging' programme.
Canada	Canadian Registered Nurse Examination (CRNE). Moving to NCLEX in 2015.	Yes	Yes	Some provinces offer it, or recommend formal competency assessment.
New Zealand	Applicants reviewed on individual basis. Usually recommended to complete competency assessment programme (CAP), which includes direct observation; scenarios interview; and evidence from self and peer assessments.	No	Yes	May be provided through CAP.
United Kingdom	ONP, 20 days learning and period of supervised practice (clinical).	No	Yes	Yes. There is a compulsory period of supervised practice (minimum of 3 months).

## Key issues

There are clearly issues other than online competency testing that need to be considered as part of any registration process. It is evident that countries have their own requirements to ensure incoming nurses are capable of safe and effective practice. The scope of the NMC's 2013 consultation does not include some of these broader issues often raised in the literature. The most common issues include:

- online and computerised competency tests
- English language tests
- cultural and transitional issues
- supervised period of practice.

### Online competency testing & objective structured clinical examinations (OCSEs)

Competency testing, including OSCEs, is used widely and generally accepted as needed and beneficial<sup>13</sup> to the registration process. However, it is the delivery mode of these tests that varies. OSCEs are used in many health practitioner assessments, such as for general practitioners (GPs) and dentists, in addition to a competence test. The US has used the computerised National Council Licensure Examination (NCLEX) exam for almost twenty years. The National Council of State Boards of Nursing (NCSBN) was the first organisation to implement computerised adaptive testing for licensure exams<sup>14</sup> and Canada is now moving towards this same system (to come into effect in 2015).<sup>15</sup> In addition, online testing and OSCEs are also often used for undergraduate studies.

There is not a strong focus on whether online and computerised competency tests should be used for overseas trained nurses in the literature. This may indicate broad acceptance of the usefulness of the method; that there are no critical concerns; or that other issues (such as language testing and cultural transitioning) are much more significant. NMC suggests the move to an online competency test will support greater consistency in how clinical knowledge and competency is identified and assessed, and it will ensure that all competencies to demonstrate safe and effective practice are tested.<sup>16</sup>

It is accepted that web-based systems can offer a variety of methods to test a range of different skills, knowledge and understanding.<sup>17</sup> Online and computerised tests

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<sup>13</sup> EdCan National Education Framework Cancer Nursing 2008 *Competency Assessment in Nursing A summary of literature published since 2000*, Australia: EdCan; Kendle A & Northcote M (2000) *The Struggle for Balance in the Use of Quantitative and Qualitative Online Assessment Tasks*, University of Western Australia and Edith Cowan University, Australia.

<sup>14</sup> National Council of State Boards of Nursing (NCSBN), About NCSBN, History. Available at: <https://www.ncsbn.org/181.htm> (accessed 09/12/13) (Web).

<sup>15</sup> NCSBN (2012) NCSBN Finalizes Agreement with Canadian Nurse Regulators. Available at: <https://www.ncsbn.org/3798.htm> (accessed 16/12/13) (Web).

<sup>16</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration: consultation. Available at: <http://www.nmc-uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf> (accessed 12/12/13) (Web).

<sup>17</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration: consultation. Available at: <http://www.nmc->

provide a less arduous and complex process for the overseas nurse to engage with; helps them better understand their requirements; and can also free up their time and 'thinking' to allow concentration on more pertinent issues such as cultural transitioning or finding a home to live in the host country. These issues all have an impact on the nurses' stress levels and abilities to assimilate faster, as well as their ability to provide high standards of care.

A move to online testing has the potential to allow more flexibility, reduce costs for applicants and the regulator, and prevent unnecessary delays—particularly when overseas nurses have already moved to the new country. Costs, security and reliability should also be considered; although this has not deferred Canada from moving to the computerised NCLEX from 2015. Security, flexibility and the ability for faster updating (results are given within a few days) were all reasons for its decision to move from the current pen and paper examination.<sup>18</sup> At the time of writing, Australia was reviewing its process for assessing applications from overseas trained nurses<sup>19</sup>—whether they will consider a similar move is unknown.

### English language proficiency

It is common practice for an English proficiency test to be part of the process for an overseas nurse to register in a host country. The International English Language Testing System (IELTS) is a well respected and widely used tool for this purpose. The NMC uses the IELTS because of its international use and recognition within nursing and midwifery. Most other healthcare regulators in the UK also use it.<sup>20</sup> The NCSBN in the US underwent a detailed process to set its language standard and considered the IELTS most appropriate, given it is the 'most widely used language test in the world'.<sup>21</sup> The variation across countries is over the requirements for IELTS levels and grades (not the actual use of the test).

While there is broad acceptance that a certain level of language proficiency is critical to practice in a new country, there are other major concerns on equity<sup>22</sup>: who should sit the test; to what level; and the content. There are also concerns whether a successful language test actually guarantees effective communication.<sup>23</sup> NMC has clarified this point previously:

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[uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf](http://uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf) (accessed 12/12/13) (Web); Kendle A & Northcote M (2000) *The Struggle for Balance in the Use of Quantitative and Qualitative Online Assessment Tasks*, University of Western Australia and Edith Cowan University, Australia.

<sup>18</sup> Neal S (2011) NCLEX in Canada, Hammond Law Group, Healthcare Immigration News, 12/13/11, available at: <http://hammondlawgroup.com/healthcareblog/2011/12/13/nclex-in-canada/>, accessed 12/12/13.

*NB. The selection of NCLEX by Canadian nursing regulators marks the first time that the exam will be used for the purpose of licensure in another country.*

<sup>19</sup> NMC, Registration and Endorsement. Available at: <http://www.nursingmidwiferyboard.gov.au/Registration-and-Endorsement/International.aspx> (accessed 12/12/13) (Web).

<sup>20</sup> NMC, International English Language Testing (IELTS). Available at: <http://www.nmc-uk.org/Registration/Joining-the-register/Trained-outside-the-EU--EEA/International-English-Language-Testing-IELTS/> (accessed 13/12/13) (Web).

<sup>21</sup> Westrate M, Westrate J (2009) Overseas Nurses Suggest Improvements to Registration Process, Kai Tiaki Nursing New Zealand, June 2009, Vol 15 No 5.

<sup>22</sup> Xu Y (2012) *Transition Programs for Internationally Educated Nurses, What can the United States learn from the United Kingdom, Australia and Canada?*, Nurs Econ. 30(4):215-223.

<sup>23</sup> Westrate M, Westrate J (2009) Overseas Nurses Suggest Improvements to Registration Process, Kai Tiaki Nursing New Zealand, June 2009, Vol 15 No 5.



*'There is a difference between having a sufficient grasp of a language to cope with day to day living and having the professional communication skills that are required to assess, plan, deliver and evaluate care for a patient or client'.<sup>24</sup>*

New Zealand's *Consultation on the Qualifications Prescribed by the Nursing Council of New Zealand for Internationally Qualified Registered Nurses* (2012) raised concerns that a written language exam could unfairly penalise those who are not 'English as a first language' speakers, and therefore reliance on competencies provides a more valid means of assessment. Canada's approach on the other hand has been to develop a 'nursing specific' language test which is a unique method that tackles some of the concerns raised, such as capturing some of the 'on the job' language aspects.

In the UK, all non-EU applicants are expected to meet a score of 7.0 to meet registration standards; and there are no plans by the NMC at present to waive the IELTS requirements.<sup>25</sup> Under European Legislation, the NMC is not allowed to ask EU trained EU nationals to demonstrate language competency as a requirement for registration in the UK.<sup>26</sup> This poses a range of other complex issues, given there are other English speaking countries that still have to sit the IELTS, however these are not within scope of this brief.

### **Cultural differences & barriers to transition**

Overseas trained nurses come from varying backgrounds and experiences – meaning they have been exposed to very different models of training and have been professionally socialised in various cultural, political, social, religious and economic circumstances.<sup>27</sup> This leads to differences in how these nurses perceive their roles, purpose and the nature of nursing. These challenges, if not addressed fully, can affect patient safety and the quality of care, as well as the health and job satisfaction of overseas nurses.<sup>28</sup> A simple process of registration only focussing on clinical or language capabilities is therefore not sufficient to ensure high standards of care are delivered, and that the nurses are regulated to the appropriate standards of the host country.

While this is not necessarily a regulatory issue, it still needs consideration. In the UK the onus falls mostly to employers to ensure sufficient transition and adaptation of the overseas nurse – and the NMC consultation is clear about this responsibility. For other countries, the employer is also likely to have a duty to provide a sufficient induction period. There are several examples in the literature of successful 'orientation' programmes for new overseas staff.<sup>29</sup> However, the terminology varies

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<sup>24</sup> NMC (2004) p5, as cited in: Xu Y (2012) *Transition Programs for Internationally Educated Nurses, What can the United States learn from the United Kingdom, Australia and Canada?*, Nurs Econ. 30(4):215-223.

<sup>25</sup> NMC, International English Language Testing (IELTS). Available at: <http://www.nmc-uk.org/Registration/Joining-the-register/Trained-outside-the-EU--EEA/International-English-Language-Testing-IELTS/> (accessed 13/12/13) (Web).

<sup>26</sup> Ibid.

<sup>27</sup> Nichols J & Campbell J (2010) The experiences of internationally recruited nurses in the UK (1995–2007): an integrative review, *Journal of Clinical Nursing*, 19, 2814–2823.

<sup>28</sup> Zizzo, K, Xu Y (2009) Post-Hire Transitional Programs for International Nurses: A Systematic Review, *The Journal of Continuing Education in Nursing*, 40(2), 57–64.

<sup>29</sup> Wittchell & Ouch (2002) as cited in Nichols J & Campbell J (2010) The experiences of internationally recruited nurses in the UK (1995–2007): an integrative review, *Journal of Clinical Nursing*, 19, 2814–2823.



greatly and it is not always clear what is covered within such a programme – whether the focus is more on clinical practice, an induction into the new organisation, or cultural adaptation. Where an overseas nurse is just given the same induction as other staff, this does not fully recognise the difference in needs for transition. Where more tailored input is appropriate, clinical supervision sessions can be used to review specific issues, for example, additional language support may be considered beneficial.<sup>30</sup>

Issues can also arise due to differences in the professional status of nurses in different countries. Overseas trained nurses can feel frustrated, or express resentment, that their qualifications, skills, knowledge and experience could be unnoticed in the new environment<sup>31</sup>, especially where more junior positions have been taken up. This can impact the quality of care given and leave staff feeling undervalued and unworthy. This poses the challenge of whether the validation of existing skills should be a priority in the registration process, or attention given to potential issues with deskilling.<sup>32</sup> Most countries do set pre-registration criteria that assess qualifications, degrees and relevant training; however this does not guarantee that the overseas nurse will still find employment at the same level as in their home country.

### **Supervised practice periods & induction programmes**

The current ONP programmes include a requirement for overseas trained nurses and midwives to undertake a period of supervised practice in a clinical setting.<sup>33</sup> NMC states ‘the supervised practice period offers a potentially useful measure of an individual’s competence because they have to perform within a real life clinical setting’. However, NMC also suggests this practice has its limitations.

In the UK, overseas trained nurses are required to undergo a minimum period of three months of supervised practice with a named mentor or supervisor to register with the NMC.<sup>34</sup> The adaptation or supervised practice courses vary in their design.<sup>35</sup> However, programmes usually consist of a theoretical component and a clinical placement. The purpose of a period of supervised practice is to ensure ‘successful achievement of statutory outcomes and competencies for professional registry by enabling candidates to gain appropriate skills for safe and effective practice’.<sup>36</sup> The theoretical element is to allow the overseas trained nurse to become familiar with:

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<sup>30</sup> Nichols J & Campbell J (2010) The experiences of internationally recruited nurses in the UK (1995–2007): an integrative review, *Journal of Clinical Nursing*, 19, 2814–2823.

<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

<sup>33</sup> Nursing and Midwifery Council (2013) Overseas competency test for United Kingdom registration: consultation. Available at: <http://www.nmc-uk.org/Documents/Consultations/2013/Overseas%20competency%20test%20for%20United%20Kingdom%20registration.pdf> (accessed 12/12/13) (Web).

<sup>34</sup> UKCC 1998 as cited in *Nursing Times* (2001) Making the best use of overseas recruits' skills, 31 May, 2001 Vol: 97, Issue: 22, Page No: 38. Available at: <http://www.nursingtimes.net/making-the-best-use-of-overseas-recruits-skills/200824.article> (accessed 13/12/13) (Web).

<sup>35</sup> The Royal College of Nursing (2002) Internationally recruited nurses good practice guidance for health care employers and RCN negotiators. Available at: [http://www.rcn.org.uk/\\_data/assets/pdf\\_file/0020/65441/irn-insides-001-788.pdf](http://www.rcn.org.uk/_data/assets/pdf_file/0020/65441/irn-insides-001-788.pdf) (accessed 12/12/13) (Web).

<sup>36</sup> Zizzo, K, Xu Y (2009) Post-Hire Transitional Programs for International Nurses: A Systematic Review, *The Journal of Continuing Education in Nursing*, 40(2), 57–64.

health care provision in the in the UK; local policy and practice; and updating in any required areas.<sup>37</sup> The clinical placement means it is possible to assess a nurse's clinical competence under supervision, and ensure that they are able to deliver safe and effective care. In addition, employers may also provide an 'induction' programme, however this is not part of NMC regulation.

According to Zizzo & Xu (2009), which reviewed 20 post-hire transitional programmes, the UK appeared to be the only country where these types of programmes are involuntary or required by government. Even where an overseas nurse may not be required to undergo the supervised practice period, the RCN has recommended that employers provide a general induction programme to UK life and culture.<sup>38</sup> This should include: information about the local area; including such things as how to register with a GP; local places of worship; local shopping; information about staff; and professional and cultural associations which may provide further support to overseas trained nurses.<sup>39</sup> Such investment can assist the host country in fully capitalising on the skills the overseas nurse brings:

*'Investing time and resources in the orientation and ongoing support of these nurses can offer managers the opportunity to benefit from the many qualities that migrant nurses bring to UK healthcare services'.<sup>40</sup>*

It is important to be clear about terminology. As discussed previously, there is some ambiguity as to each country's treatment of an 'induction' period for overseas trained nurses. The terminology for programmes in Australia, New Zealand, US and Canada fluctuates around the use of *bridging*, *transition* or *adaptation* programmes. Canada, for example, focuses more on pre-hire bridging (or upgrading) programmes for overseas trained nurses.<sup>41</sup> In the US most employers require overseas nurses to participate in the same 'orientation' programme as new nurse graduates (or domestically educated).<sup>42</sup> Although most countries have a form of a 'supervised practice period', these programmes are not necessarily at pre-registration stage and there is little information around the effectiveness of these programmes.<sup>43</sup>

Additionally, the concerns raised are generally more around the assignment of mentors; whether there are enough staff to assist; adequate training for mentors to ensure consistencies; having sufficient time between other clinical commitments; or potential margins for error.

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<sup>37</sup> The Royal College of Nursing (2002) Internationally recruited nurses Good practice guidance for health care employers and RCN negotiators, available at: [http://www.rcn.org.uk/data/assets/pdf\\_file/0020/65441/irn-insides-001-788.pdf](http://www.rcn.org.uk/data/assets/pdf_file/0020/65441/irn-insides-001-788.pdf), accessed 12/12/13.

<sup>38</sup> Ibid.

<sup>39</sup> Ibid.

<sup>40</sup> Nichols J & Campbell J (2010) The experiences of internationally recruited nurses in the UK (1995–2007): an integrative review, *Journal of Clinical Nursing*, 19, 2814–2823.

<sup>41</sup> Xu Y (2012) *Transition Programs for Internationally Educated Nurses, What can the United States learn from the United Kingdom, Australia and Canada?*, *Nurs Econ*. 30(4):215-223.

<sup>42</sup> Zizzo, K, Xu Y (2009) Post-Hire Transitional Programs for International Nurses: A Systematic Review, *The Journal of Continuing Education in Nursing*, 40(2), 57–64.

<sup>43</sup> Ibid.

The need for some form of *adaptation* programme (and in a clinical setting) is clear. The challenges during transition are widely documented.<sup>44</sup> Xu (2012) argues that transitioning is a regulatory issue and there is a need for evidence-based transition programme for the acute care setting. But there is little literature on transition programmes in the US and other countries as an intervention to address these challenges.<sup>45</sup> As discussed, the UK system puts the responsibility on the employers to ensure nurses are adequately prepared for the new work setting.

## RCN view

The RCN responded to NMC's consultation in October 2013 and welcomed the discussion on arrangements for processing overseas trained applicants wishing to register with the NMC. The main points raised in its response included:

- agreement with continuing the current language requirements
- noting there are issues to cover outside of the competency test
- agreement with the move towards an OSCE-type competency test, but noting the need for some form of supervised practice to continue.

There seems to be very limited evidence as to the effectiveness or otherwise of the current ONP system and it is not clear that the NMC has undertaken any extensive review. So whilst the RCN is broadly supportive of moving to a competency based approach with structured performance assessments, it is important that effective evaluation of any new system is built into its development and implementation.

One of the major issues for overseas nurses is adaptation into working culture and practices in health services in the UK. Whilst some form of supervised practice can assist in these issues the RCN would want to see a strong emphasis placed on the responsibilities of individual employers for mandatory induction training for overseas nurses.

Clearly the NMC needs to undertake further work to develop both the online written test, the OSCE and identify the potential costs, as well as reviewing other key elements of the programme—in particular supervised practice and wider communication skills to complement the IELTS test or a replacement.

Ultimately patient safety has to be paramount and patients, the public, registrants and others working in our health services need to be confident that the system is robust, accessible, as well as fair and timely for those overseas nurses wishing to practise in the UK. The NMC needs to use its consultation as a starting point for building the confidence of registrants, potential registrants, employers and the public in the broader process. The RCN will continue to engage with NMC as it reviews its registration processes and in the development of any new tests.

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<sup>44</sup> Xu Y (2012) *Transition Programs for Internationally Educated Nurses, What can the United States learn from the United Kingdom, Australia and Canada?*, Nurs Econ. 30(4):215-223.

<sup>45</sup> Ibid.

For the RCN's full response to NMC's consultation (2013), please see:  
[http://www.rcn.org.uk/\\_data/assets/pdf\\_file/0009/546579/81.13\\_RCN\\_Response\\_Compentency\\_testing\\_for\\_overseas\\_trained\\_nurses\\_and\\_midwives.pdf](http://www.rcn.org.uk/_data/assets/pdf_file/0009/546579/81.13_RCN_Response_Compentency_testing_for_overseas_trained_nurses_and_midwives.pdf).