



Response to the NMC Consultation

Student Indexing

August 2011

1. Introduction

- 1.1 UNISON is the largest public sector union in health with 450,000 members employed across the service. We are pleased to have the opportunity of responding to the Nursing and Midwifery Council (NMC) consultation on Student Indexing.
- 1.2 As the largest trade union and the voice of the healthcare team we influence policy at regional, national and international level. We work with Government and other international unions to shape healthcare with other trade unions on healthcare issues. UNISON has a long history of working with organisations and individuals who work and campaign in these areas of practise and care provision. UNISON works closely with each of the regulators to establish standards and policies in both patient care and education. We are a key stakeholder and value the opportunity to improve patient care and the working experiences of Nurses and Midwives.
- 1.3 As part of our consultation process, we have sought the views of our members, activists and regions using a variety of methods. Furthermore, information has been available through our communications network to encourage members to express their views.
- 1.4 We hope that the NMC will take into account the weight of UNISON's views as a major stakeholder and that our collective response carries the opinions of our entire nursing, midwifery and specialist public health nurses.
- 1.5 UNISON welcomes the NMC decision to extend the lead in time of the student indexing to Spring 2012 rather than implement this coming September as previously planned. This will allow key stakeholders more time to debate and develop a robust system which can be used to analyse and inform appropriate action.

2. Background

- 2.1 To canvass a broad range of opinion, UNISON through its communications network has sought the views of its members as well as UNISON regional representatives across the UK in order to obtain a balance view on the NMC proposals.
- 2.2. In conjunction with this response UNISON has completed and submitted the NMC's short online survey.

3. Student Indexing

- 3.1 **Are there any reasons why you think the NMC should not introduce a student index?**
UNISON applauds the NMC for re-introducing the student indexing for the purposes of safeguarding the health and wellbeing of the public. However, any new system will need to be 'road tested' with the provision to collect equality and diversity data.
 - 3.1.1. Further clarification is needed with regards to the NMC's intention to collect equality and diversity data and whether there will be a provision to collect such data from the outset. As it stands there appears to be some ambiguity in this regard. For example, in the consultation document the NMC cites that the data obtained from the student indexing could be used to identify whether there are any particular groups of students that are over-represented in fitness to practise cases. Whereas, in other arenas the NMC has stated that the provision for such data will not be introduced until at a later stage. UNISON would have very strong concerns if

the NMC adopted the latter approach as this would prevent the NMC from collecting meaningful data.

3.1.2. Moreover, it would be an opportunity for the NMC to maximise its credibility and effectiveness as well as quite rightly give the perception that the NMC takes equality and diversity seriously.

3.2. UNISON notes that student indexing is not new and in fact prior to the creation of the NMC, its predecessor organisations were required to keep records of students who were training on all their approved nursing and midwifery programmes. However, it is not clear whether the re-introduction of student indexing contains the original characteristics or whether the proposed system is building on the original scheme. If so, it is not clear what elements are new.

3.2.1. Whilst UNISON appreciates that student indexing will provide a database for the statistical analysis of trends in nursing and midwifery programmes it is not clear however what trends or patterns you are seeking to collect.

3.3. Furthermore, clarification is needed on the role of the approved education institutions (AEIs) as this appears to differ, substantially, in various parts of the UK. That is, the consultation document seems to imply that AEIs in England, Northern Ireland and Wales will only be responsible for submitting data to the NMC for indexing. Whereas, in Scotland AEIs will be responsible for submitting updates to students' personal details as well as be responsible for making the NMC aware of students who have been discontinued for serious concerns or misconduct. This element of the student indexing is extremely important and needs to be system-wide, throughout the UK, in order to achieve the NMC's goals in enhancing public protection.

3.4. **Do you think that introducing a student index could have a negative impact on any particular group(s) in society?**

UNISON believes there is potential for some groups to be negatively impacted by student indexing such as ethnic minorities and men. For this reason it is essential that provisions for the collection of equality and diversity data is made available from the outset. This will enable the NMC to use the data to analyse and focus resources on the areas that need to be addressed.