



ROYAL CYMDEITHAS
PHARMACEUTICAL FFERYLLOL
SOCIETY FRENHINOL

Wales Cymru

2 Ashtree Court,
Woodsy Close
Cardiff Gate Business Park
Cardiff
CF23 8RW

T: [REDACTED]
E: [REDACTED]
W: www.rpharms.com

National Assembly for Wales / Cynulliad Cenedlaethol Cymru
[Health and Social Care Committee / Y Pwyllgor Iechyd a Gofal Cymdeithasol](#)

[Safe Nurse Staffing Levels \(Wales\) Bill / Bil Lefelau Diogel Staff Nyrsio \(Cymru\)](#)

Evidence from Royal Pharmaceutical Society – SNSL(Org) 14 / Tystiolaeth gan Cymdeithas Fferyllol Frenhinol – SNSL(Org) 14

Committee Clerk
Health and Social Care Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

20 January 2015

Dear Sir/Madam

Consultation on the Safe Nurse Staffing Levels (Wales) Bill

The Royal Pharmaceutical Society (RPS) welcomes the opportunity to contribute to the consultation on the Safe Nurse Staffing Levels (Wales) Bill.

About the Royal Pharmaceutical Society (RPS)

The Royal Pharmaceutical Society (RPS) is the professional body for every pharmacist in Great Britain. We are the only body that represents all sectors of pharmacy in Great Britain.

The RPS leads and supports the development of the pharmacy profession within the context of the public benefit. This includes the advancement of science, practice, education and knowledge in pharmacy. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums. Its functions and services include:

- **Leadership, representation and advocacy:** promoting the status of the pharmacy profession and ensuring that pharmacy's voice is heard by governments, the media and the public.
- **Professional development, education and support:** helping pharmacists to advance their careers through professional advancement, career advice and guidance on good practice.
- **Professional networking and publications:** creating a series of communication channels to enable pharmacists to discuss areas of common interest.

General comments

We welcome the attention that is currently being given to safe staffing levels in the NHS as a result of the introduction of the Safe Nurse Staffing Levels (Wales) Bill. We fully agree that driving up quality of patient care, improving patient safety and the patient experience are vitally important

issues requiring immediate attention in Wales. In these respects we are fully supportive of the spirit of the Bill.

We believe that patient safety must be the key driving force for statutory and legislative changes to workforce planning and the deployment of NHS staff groups. As such we believe any change should reflect the way in which patient care is being delivered in the NHS - through multi-professional teams. We are concerned therefore that the uni-professional nature of the current Bill may restrict opportunities in practice to address safe staffing levels across the full range of professional groups responsible for delivering patient care in Wales.

We appreciate the need for strengthening accountability for the safety, quality and efficacy of workforce planning and management as enshrined in the Bill. We believe legislation should only be considered however when all other avenues have been fully exhausted. In this respect it is not totally clear why existing guidance to ensure safe staffing levels as recommended by NICE and the Chief Nursing Officer have not delivered improvements across Wales or if other steps could be taken to improve workforce planning as an alternative to introducing legislation.

Provisions of the Bill

We agree that health service bodies should be held to account for ensuring an appropriate level of NHS staffing and that they should be required to publish an annual report detailing how this duty has been complied with. We are concerned that the Bill currently misses opportunities however to apply this principle to all staff groups involved in NHS care. We believe it would be more effective to ensure a duty is placed on health service bodies to undertake robust planning to meet patient need not only with adequate numbers of staff but importantly with the right skill mix of staff. Such an approach would allow for greater flexibility for matching NHS resources to local needs.

We agree there is a need to increase protections for certain activities and particular professional roles. Protected time for professional development for instance is essential for improving skills and delivering high quality and safe care. We are concerned however that guidance issued by the Welsh Ministers to health service bodies on specific protections for one professional group could restrict future planning, skill mix and scope for innovation. Setting staff protections in law at any given point of time may have significant implications for the future and inhibit plans by health service bodies to introduce new ways of working. We strongly believe that flexibility is needed for health service bodies to plan and deliver services that can meet patient need. We are concerned that these protections may have a negative impact on that flexibility.

Financial implications

We are concerned that the Bill as it currently stands could restrict the flexibility of health service bodies in their financial planning and the implementation of workforce plans to meet population and service needs. The notion of mandatory minimum nurse staffing levels may place a significant financial burden on health service bodies when complying with this duty and restrict plans to invest in other staff groups that are needed to deliver new models of care. We believe it is important that health service bodies are able to utilise their funding allocations appropriately and flexibly to meet the population and service needs identified in their geographical areas.

Unintended consequences

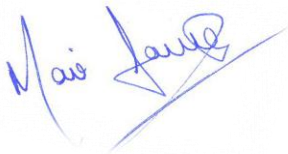
We also have concerns that assuring the numbers of one particular staff group may have unintended consequences for that staff group as well as other staff groupings. For instance roles may be redefined within the staff group simply to justify staff quotas and this may inhibit the

development of other staff groups where similar quotas are not in place. Introducing the proposed legislation as it stands could potentially restrict the flexibility needed for workforce planning across the full range of staff groups and professions and we are concerned that this could potentially have a detrimental effect on patient care, in direct contrast to the intentions of the Bill.

In conclusion, we are pleased to support action to strengthen workforce planning and increase the accountability of health service bodies to deliver safe levels of NHS staffing. We are adamant however that this should apply to all staff groups to more fully reflect the multi-professional and multi-disciplinary nature of healthcare provision in the NHS. If legislation is deemed the only solution to address these important issues then we believe it should include all health professional groups.

I trust this information is helpful and would be pleased to elaborate on any issues in further detail.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Mair Davies', with a stylized flourish underneath.

Mair Davies FRPharmS
Chair, RPS Welsh Pharmacy Board