

---

# Comisiynydd Plant Cymru Children's Commissioner for Wales

## Keith Towler

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 Children's Commissioner for Wales - SNSL(Org) 26 / Tystiolaeth gan Comisiynydd Plant Cymru - SNSL(Org) 26

---

David Rees AM  
Health and Social Care Committee (Chair)  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

13 February 2015

Dear Mr Rees

### Safe Nurse Staffing Levels Bill

With regard to your request to provide a response from the office of the Children's Commissioner for Wales on the impact of the Safe Nurse Staffing Levels Bill on children and young people, please find our response below:

- **In the first instance that the duty on nurse staffing ratios applies to adult inpatient wards in acute hospitals (though this may be extended to other settings in the future) – we would welcome your views on this;**

We feel that any legislation introduced in relation to safe nurse staffing levels should apply to both adult and children's wards. It is surprising that staffing levels in children's wards have not been included at the outset of the development of this legislation and there appears to be no clear rationale as to why children and young people would not be subject to statutory minimum staffing numbers.

The Explanatory Memorandum accompanying the Bill refers to the mandatory child to adult ratios as set out in the National Minimum Standards for Regulated Child Care which states that 'children benefit because the ratio of adults to children conforms to best practice', however the Bill does not extend this requirement to children on a hospital ward.

We welcome in the CRIA the recognition of the fact that young people may be placed on adult wards, however this should only be used in exceptional circumstances and most children and young people will still be placed on children's wards. While the Bill will place a "wider duty on health service bodies to have regard to the importance of ensuring an appropriate level of nurse staffing wherever NHS nursing care is provided" we feel that this does not go far enough and would suggest that if "having regard" is not considered sufficient for staffing an adult ward then likewise it is not satisfactory for a children's ward.

cont/d.....

David Rees AM  
Health and Social Care Committee (Chair)  
Page 2  
13 February 2015

- **Whether there are any potential issues arising from children and young people being placed on adult wards that may be relevant to the scrutiny of this Bill.**

We recently responded to the consultation on the draft Inappropriate Admissions Guidance from Welsh Government. Within that guidance it is accepted that young people should be placed on adult wards only in exceptional circumstances and all such incidents should be reported and monitored by Welsh Government. We also called for the guidance to state clearly that paediatrics and CAMHS will be expected to continue to provide support and care in the event of placement of an under 15 year old on an adult ward. This may potentially impact on the staffing levels on the children's wards at times and may require further consideration.

Yours sincerely,



**Eleri Thomas**  
**Chief Executive Officer/Deputy Children's Commissioner**