

An Bord Altranais
Nursing Board

SANCO Health Workforce
European Commission
B-1049
Brussels
Belgium

25 March 2009

Re: Consultation on Green Paper on European Workforce for Health

Dear Sir/Madam,

An Bord Altranais welcomes the opportunity to participate in the European Commission's Consultation on its Green Paper On the European Workforce for Health. Our comments are made with reference specifically to sections (4-8) within the green paper.

4.1 Demography and the promotion of a sustainable health workforce

An Bord Altranais welcomes any EU initiative to improve the quality of life for older people. In this regard An Bord Altranais supports a highly educated professional nursing workforce to support the complex health care needs of older people. In this respect An Bord Altranais has developed Practice Standards for nurses with the responsibility for providing care to the older person (An Bord Altranais, 2009/in press).

An Bord Altranais has set standards for return to practice courses which enable nurses/midwives who have left the workforce to return and update both their theoretical knowledge and their clinical skills and to facilitate the attainment of competence and confidence in the provision of nursing/midwifery care. See *Return to Nursing Practice Courses. Requirements of An Bord Altranais* (An Bord Altranais, 2005) and *Return to Midwifery Practice Courses. Requirements of An Bord Altranais* (An Bord Altranais, 2005)

An Bord Altranais welcomes recruitment campaigns that promote nursing as an attractive career pathway. An Bord Altranais manages the Nursing Careers Centre and one of its responsibilities is the promotion and marketing of nursing and midwifery.

4.2 Public health capacity

An Bord Altranais maintains a register of public health nurses (n = 2366). Public health nurses are general nurses and they contribute to public health by providing primary, secondary and tertiary care to individuals, families and communities across the lifespan to a geographic area. They are key health and primary care practitioners who have been trained and educated as public health workers using a partnership and empowerment approach with individuals, families and communities.

The public health nurse role is not universal within the EU. An Bord Altranais would support the development of this specialism within the EU.

4.3 Training

Nurses and midwives are required to be flexible and adaptable within today's complex healthcare settings and issues such as accountability and competency are of paramount importance in relation to the role of the nurse/midwife. Continuing competency is needed for all nurses and midwives to promote and maintain health, as well as being able to deliver competent care during illness, rehabilitation and dying. Nurses and midwives need to be committed to personal and professional development.

The Code of Professional Conduct for each Nurse and Midwife (An Bord Altranais, April 2000a) and the *Scope of Nursing and Midwifery Practice Framework* (An Bord Altranais, April 2000b) emphasise the need for nurses and midwives to be competent and accountable for their practice. An Bord Altranais would welcome the introduction of a legal requirement in all countries of the European Union for nurses and midwives to revalidate their competence to practice as a requirement to maintain their name on the Register of nurses/midwives.

Current legislation in Ireland allows An Bord Altranais to carry out its regulatory functions in relation to the setting of standards and disciplinary processes. An Bord Altranais is aware that determining a method of evaluating continuing competence is often the most challenging activity performed by a regulatory body. However, all regulators must implement some mechanism to assess the ongoing competence of members because continuing competence is a quality enhancement action that is one method of assuring the public that practitioners are safe.

A mandatory framework for competency assurance would also allow for a mechanism to be established in relation to individuals from other EU member states who have "acquired rights" under the provision of Articles 33 and 43 of the EU Directive 2005/36/EC.

An Bord Altranais supports the encouragement of mature workers that meet the quality and competence of the existing nursing profession.

An Bord Altranais supports management training and encourages training programmes across the EU.

An Bord Altranais supports the development of an EU Observatory.

4.4 Managing mobility of health workers within the EU

An Bord Altranais supports the three main areas upon which the Directive is structured i.e. common principles in all EU health systems, a specific framework for cross-border healthcare and European co-operation on healthcare. From a perspective of providing quality and safe standards of nursing care for patients, An Bord Altranais believes that effective structures to support the sharing of best practice in relation to the regulation of education, professional competence, practice, and fitness to practice standards should exist between member states. A structure that enables competent authorities to share information regarding the status of professionals in relation to their competence and conduct would be an important mechanism to ensure the delivery of safe, high quality and efficient cross-border health care. It would also facilitate co-operation between member states and support the continued development of high standards and best practice in terms of professional education, training and practice.

An Bord Altranais is fully supportive of European cooperation on healthcare. It recognises the authority, sovereignty and responsibility of each member state but supports greater collaboration and harmony between States and would welcome an extension to the current Directive 2005/36 to include outcome factors from educational providers for nursing programmes.

As a founding member of FEPI, the European Federation of Nursing Regulators, An Bord Altranais believes that this organisation could be a mechanism to support confidence in the quality and safety of patients in terms of the nursing care being provided in Member States. FEPI also has the capacity going forward of providing a European Reference Network which can support the sharing of data across competent authorities in relation to professional education, competence, professional practice and discipline. This would be congruent with the Commissions objectives in establishing a community framework for cross border healthcare and would support the provision of nursing care in accordance with clear standards of quality and safety defined within and shared between the Member States. This co-operation would also be congruent with the priority areas for Community Action in Public Health in the 2003-2008 programme.

An Bord Altranais asserts that the Directive needs to ensure that patients are protected through the effective professional regulation of healthcare services, institutions and health care providers across all member states. An Bord Altranais is convinced that such action is essential to ensure that the necessary requirements for high-quality, safe and efficient healthcare are ensured for cross-border care.

4.5 Global migration of health workers

An Bord Altranais supports the areas for action.

4.6 Data to support decision-making

An Bord Altranais supports the areas for action.


5. The impact of new technology: Improving the efficiency of the health workforce

An Bord Altranais is of the opinion that further clarification is required in relation to E-health and telephone health, should problems arise in these methods of practice delivery. The position regarding redress should be clear for the patient if their care is provided in another member state. An Bord Altranais suggest that the issues of follow-up and accountability to the patient in such situations requires further clarification.

Other

An Bord Altranais would welcome the opportunity to re-examine the language competence requirements of health professionals to provide safe effective care across the EU.

Yours sincerely,



Eugene Donoghue
Chief Executive Officer

This paper represents the views of its author on the subject. These views have not been adopted or in any way approved by the Commission and should not be relied upon as a statement of the Commission's or Health & Consumers DG's views. The European Commission does not guarantee the accuracy of the data included in this paper, nor does it accept responsibility for any use made thereof.