Dear Kirsty,

Safe Nurse Staffing Levels (Wales) Bill

BMA Cymru Wales is grateful for the opportunity to respond to the consultation on the draft Safe Nurse Staffing Levels (Wales) Bill.

The BMA represents doctors from all branches of medicine all over the UK; and has a total membership of over 150,000 including more than 3,000 members overseas and over 19,000 medical student members. It is the largest voluntary professional association of doctors in the UK, which speaks for doctors at home and abroad, and is also an independent trade union. BMA Cymru Wales represents some 7,000 members in Wales from every branch of the medical profession.

Whilst we do not intend to provide a detailed response to this consultation, we would nonetheless reiterate our firm support for the intended principles of the Bill and broadly welcome its publication in its current draft form.

We would also wish to make the following brief observations which we hope can be taken into account as the Bill is further considered:

- We support the change of name since the previous consultation to the ‘Safe Nurse Staffing Levels (Wales) Bill’. We feel that the use of the word ‘safe’ better reflects the purpose of the Bill than the word ‘minimum’, by focusing on the intended outcome.
- In the paragraph numbered 10A (1) (b) (3), we consider that what is meant by ‘additional settings’ could benefit from being defined so that it is clearer what might be intended.
- Detail could be provided in relation to how NHS management would be held to account to deliver the safe nurse staffing levels that are required by the provisions of the Bill.
- Consideration could be given as to how individual members of staff might be able to raise concerns without fear of reprisal in cases where they may observe that the provisions of the Bill are not being met by NHS management in a particular setting.
- Guidance may be required to clearly define what is meant by a safe staffing level which also takes account of providing an appropriate skill mix (e.g. between nurses and healthcare workers) for this to be achieved.

Yours sincerely,

Rodney Berman
Senior Policy Executive

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