Meeting the practice hours requirement: Direct entry midwife Specialist Community Public Health Nurses (Midwife/SCPHN)

What changes are there with revalidation to the practice hours requirement for midwives working as SCPHNs?
Under the Post Registration Education and Practice (PREP) standards, direct entry midwives working only as SCPHNs (Midwife/SCPHNs) were required to declare that they had undertaken 450 hours of practice for their midwifery practice and 450 hours for their SCPHN practice during the three years since they last renewed their registration. They were also required to have supervision from a Supervisor of Midwives (SOM) and to submit an Intention to Practise (ItP) form if they were intending to practise as a midwife. Under revalidation Midwife/SCPHNs will only be required to undertake 450 hours of practice in order to maintain their midwifery and SCPHN registration. If they do not intend to also work as a midwife, they will not be required to undertake supervision or submit an ItP.

Why is this change taking place?
The process of submitting an ItP frequently created problems for SCPHNs if they were not able to satisfy their SOM that their practice as a SCPHN met the competencies required for midwifery and also created an additional work load for SOMs. In addition it caused inequity between Midwife/SCPHNs who required an additional layer of regulation and their nurse/SCPHNs colleagues. Unite/CPHVA had long argued that this was unfair and was difficult to justify in terms of public protection. The introduction of revalidation, with new standards, has provided an opportunity to address these issues. The NMC have confirmed that this change is legally acceptable. It was tested in the revalidation pilot with no concerns raised and all four CNOs have agreed that it is a good solution. It also recognises that the SCPHN scope of practice is distinct from that of a midwife.

I remember being told in 2006 that I didn’t need to maintain my midwifery if I was working as a SCPHN only to then be told in 2007 that this was illegal as the NMC regulates only nurses and midwives. How is this different?
The SCPHN qualification is a post registration qualification that can be obtained by those holding a nursing or midwifery registration. A nurse or midwife who successfully completes the programme remains on the nursing or midwifery register but can then practise as a SCPHN. Midwife/SCPHNs therefore remain registered midwives but not necessarily practising midwives. The key term here is practising. Rule 3 of the Midwives Rule and Standards (NMC, 2012) states that ‘If a midwife intends either to be in attendance
upon a woman or baby during childbirth or to hold a post for which a midwifery qualification is required she must give notice of that intention in accordance with this rule’. A registered midwife working only as a SCPHN is no longer in a role for which practising midwife status is required.

By choosing to not submit an ItP, SCPHNs will no longer count as practising midwives but will remain registered midwives. There is no change to the position that SCPHNs must maintain their registration as a nurse or as a midwife and cannot renew their registration only as a SCPHN.

**Does this change apply to all midwives working in roles other than midwifery, for example FNP, sexual health?**

No; a midwife working as for example, an FNP/Sexual health/Neonatal nurse who does not hold a post registration SCPHN qualification will be using only their midwifery registration so Rule 3 will apply to them.

**Am I able to continue to work as a midwife as well as a SCPHN?**

Yes; if you want to continue working as midwife you will need supervision and to submit an ItP. However, you will only be required to meet the revalidation practice hours requirement for one registration, which requires 450 hours of practice. The NMC will be withdrawing the guidance on mapping SCPHN practice to the midwifery competencies as you no longer need to demonstrate 900 practice hours (which included 450 hours for midwifery practice, even if you were not practising as a midwife). You will demonstrate your scope of practice within your revalidation application.

The only situation now where 900 hours of practice is required is if you are working both as a nurse and as a midwife and are therefore required to be registered on both parts of the register.

It should be noted that the legislation related to midwifery regulation is in the process of being changed. This will remove the requirement for any midwives, whether practising or not, to have supervision and to submit ItPs. This change is likely to take effect early in 2017 and you will have an opportunity to contribute to a Department of Health led-consultation on these changes in 2016.