

Paul Brownlow
Assistant Coroner of Inner London South Area
[REDACTED]

8 June 2021

Dear Mr Brownlow

Prevention of Future Deaths Report for Ella Adoo Kissi-Debrah

Thank you for sharing your Prevention of Future Deaths Report, and for giving us an opportunity to respond to the important concerns that you have raised.

Before I address the concerns, I would like to extend my deepest sympathy to Ella's family and friends.

In your Report you have asked us to comment on the following areas:

- “3. The adverse effects of air pollution on health are not being sufficiently communicated to patients and their carers by medical and nursing professionals. The evidence at the inquest was that this needs to be addressed at three levels:*
- a. Undergraduate. I am informed that undergraduate teaching is the responsibility of the GMC, Health Education England and the NMC.*
 - b. Postgraduate. I am informed that postgraduate education is the responsibility of the Royal Colleges, in this case, the Royal College of Physicians, the Royal College of Paediatrics and Child Health, the Royal College of General Practitioners, and the NMC.”*

As part of our response, I have set out in more detail our vision of building safe, effective and kind nursing care, and how we seek to achieve this. I have addressed the specific areas of concern you have raised in relation to undergraduate and postgraduate education, and provided some additional information regarding our [Code, professional standards of practice and behaviour for nurses, midwives and nursing associates](#) that I hope you find helpful. I have also identified three areas where we will reflect on the learning you have identified in your PFD Report, as follows:

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We are the UK nursing and midwifery regulator. Our role is to protect patients and the public through efficient and effective regulation.

Registered charity in England and Wales (1091434) and in Scotland (SC038362)

- We will consider the concerns that you have raised in our evaluation of our new Future Nurse pre-registration standards, focussing on whether those standards are continuing to meet the requirements of what is necessary for safe and effective practice. Moreover, whether the proper implementation of the standards by education institutions will play a part to reduce the risk of cases such as Ella's arising again in the future.
- We will consider the concerns that you have raised as part of our current consultation on post-registration standards, to ensure that the parts of our new Post Registration Standards for specialist community public health nursing and specialist practice qualifications for community nursing which relate to the prevention and management of ill health will reduce the risk of information not being communicated clearly.
- We will identify if there is further activity that we can do to make sure that the professionals on our register understand their obligations to communicate clearly to their patients and their families about evidence related to the management and prevention of ill-health, and help prevent tragic cases such as Ella's from occurring again.

Our role

Our vision is safe, effective and kind nursing and midwifery that improves everyone's health and wellbeing. As the professional regulator of almost 732,000 nursing and midwifery professionals, we have an important role to play in making this a reality.

Our core role is to regulate. First, we promote high education and professional standards for nurses and midwives across the UK, and nursing associates in England. Second, we maintain the register of professionals eligible to practise. Third, we investigate concerns about nurses, midwives and nursing associates. We believe in giving professionals the chance to address concerns, but we will always take action when needed.

Undergraduate education for nursing professionals

Nurses, midwives and nursing associates (in England) who wish to practise in the UK must be registered with us. Professionals who are seeking to be registered with us must meet the standards of proficiency necessary for safe and effective practice, and additional requirements for registration, for example, our health and character requirements¹.

¹ Article 5(2) of the Nursing and Midwifery Order 2001

Nursing and midwifery professionals can demonstrate that they have met these standards of proficiency by completing approved qualifications,² which includes undergraduate education courses that have been approved by us in the UK³. We also set programme standards and wider education standards, which enable our approved education institutions to deliver programmes related to our standards of proficiency⁴. The approved education institutions will design their curriculums to be able to meet our standards. We set the standards and monitor the education institutions and programmes as part of our Quality Assurance activities⁵.

In 2016, we embarked on a significant programme of change in relation to all of our education and training standards, which has included revising our standards of proficiency for nurses and midwives. We introduced new [standards of proficiency for registered nurses](#) in 2018, (described as the Future Nurse standards⁶), and [midwives](#) in 2019, (described as the Future Midwife standards⁷).

The Future Nurse standards were approved by our Council, following extensive consultation and engagement over a two year period. All undergraduate programmes in the UK have been approved against the new Future Nurse standards. We expect the first nurses to graduate under these new standards in 2022.

The Future Nurse standards of proficiency are arranged across a series of platforms, which detail the outcomes that we expect nurses who are seeking to register with us to have met. We get this assurance from our approved education institutions.

Platform 2 of the Future Nurse standards is described as “*Promoting health and preventing ill health*”. The proficiencies that are detailed in this platform will equip the newly registered nurse with the underpinning knowledge and skills required for their role in health promotion, and protection and prevention of ill health. At the point of registration, the nurse is expected to be able to understand the aims and principles of health promotion, improvement and prevention of ill-health, and be able to communicate appropriately in respect of these concerns. I have set out below the relevant standards:

“At the point of registration, the registered nurse will be able to:

- 2.1. *understand and apply the aims and principles of health promotion, protection and improvement, and the prevention of ill health, when engaging with people.*
- 2.2. *demonstrate knowledge of epidemiology, demography, genomics and the wider determinants of health, illness and wellbeing, and apply this to an understanding of global patterns of health and wellbeing outcomes.*

² Article 15 of the Nursing and Midwifery Order 2001

³ Article 13 of the Nursing and Midwifery Order 2001

⁴ Article 15(1) of the Nursing and Midwifery Order 2001

⁵ Article 15(5) of the Nursing and Midwifery Order 2001

⁶ ‘Future Nurse: standards of proficiency’, published May 2018

<https://www.nmc.org.uk/standards/standards-for-nurses/standards-of-proficiency-for-registered-nurses/>

⁷ ‘Future Midwife: standards of proficiency’, published November 2019

<https://www.nmc.org.uk/standards/standards-for-midwives/standards-of-proficiency-for-midwives/>

- 2.9. *use appropriate communication skills and strength based approaches to support and enable people to make informed choices about their care to manage health challenges in order to have satisfying and fulfilling lives within the limitations caused by reduced capability, ill health and disability.*
- 2.10. *provide information in accessible ways to help people understand and make decisions about their health, life choices, illness and care”.*

While the standards do not expressly refer to environmental factors affecting health, we believe that these would be covered by the reference to “wider determinants of health” expressed in the standards.

In addition to the Platform itself, we have also developed a detailed list of communication skills that we expect our nursing professionals to demonstrate at point of registration. The communication skills draw together the communication techniques and skills required to communicate effectively, taking into account best practice and evidence the management and prevention of ill-health. Here is an excerpt from Paragraph 2 of the communication skills annexe to the standards:

“At the point of registration, the registered nurse will be able to safely demonstrate the following skills:

2. *Evidence-based, best practice approaches to communication for supporting people of all ages, their families and carers in preventing ill-health and in managing their care.*
- 2.1. *Share information and check understanding about the causes, implications and treatment of a range of common health conditions, including anxiety, depression, memory loss, diabetes, dementia, respiratory disease, cardiac disease, neurological disease, cancer, skin problems, immune deficiencies, psychosis, stroke and arthritis.”*

We therefore expect nurses who have completed programmes approved under our Future Nurse standards to be suitably equipped to communicate clearly the adverse effects about air pollution on health to patients, their families and carers.

I have included the entirety of Platform 2 and Annexe A of the Future Nurse standards, which details the communication skills expected at point of registration, as an appendix to this letter.

We will be carrying out an independent evaluation exercise of the Future Nurse standards. As part of this exercise, we will reflect on the concerns raised by your report to help us understand whether the standards of proficiency are being used to their full potential. We will use this exercise to consider whether the Future Nurse standards are continuing to meet the requirements of what is necessary for safe and effective practice. Moreover, whether the proper implementation of the standards by education institutions will reduce the risk of cases such as Ella’s arising again in the future.

Postgraduate education for nursing professionals

Nurses and midwives who are initially registered with us may pursue additional qualifications that can also be registered with us. We describe these as post-registration qualifications. We do not set the requirements for all postgraduate education of nursing professionals.

At present, we regulate two different types of post-registration qualifications. If someone successfully undertakes a Specialist Community Public Health Nursing (SCPHN) course, they can join the SCPHN part of the register, in addition to the part of the register which indicates their initial registration as a nurse and/or a midwife. The SCPHN part of the register also denotes the field of SCPHN practice. Professionals can enter this register as a health visitor, school nurse, occupational health nurse, family health nurse or public health nurse. This qualification also enables them to use the protected title 'Specialist Community Public Health Nurse', because it is protected in law by virtue of being a separate part of the NMC register.

Nurses can also gain an NMC approved specialist practice qualification (SPQ). This qualification is noted, or 'annotated', next to their name as it already appears on the register. This demonstrates that they have successfully undertaken a course in a particular specialty that the NMC has approved, which the public can then check, but it does not confer exclusive use of any protected title associated with the qualification.

As we have stated above, we are consulting⁸ on draft standards of proficiencies for SCPHN and SPQ, and accompanying programme standards. The draft standards of proficiency have been designed taking into account the important lessons from the pandemic, and the role that public health and community nursing plays in the prevention and management of ill-health.

As part of our consideration of the consultation responses, we will be reflecting on the concerns raised by your Report into Ella's death to see if the proficiencies can be strengthened, so as to address those concerns.

Our Code

I note that you have not specifically asked about our Code, and have focussed on our education standards. However, I think it is helpful to understand our expectations regarding the standards and behaviours for professional practice, and what we would hope nurses involved in the care of someone in a similar situation to Ella should consider.

Once admitted to our register, our professionals are required to meet the requirements of our [Code](#)⁹. The Code details professional practice and behaviours that all of our professionals must meet and reflect upon, as part of their revalidation and renewal of their registration every three years.¹⁰

⁸ <https://www.nmc.org.uk/about-us/consultations/current-consultations/future-community-nurse/>

⁹ <https://www.nmc.org.uk/standards/code/read-the-code-online/>

¹⁰ Article 10 of the Nursing and Midwifery Order 2001

The Code requires nurses and midwifery professionals to communicate clearly and practise safely. I highlight the following sections of the Code:

“3. *Make sure that people’s physical, social and psychological needs are assessed and responded to*

To achieve this, you must:

- 3.1. *pay special attention to promoting wellbeing, preventing ill health and meeting the changing health and care needs of people during all life stages.*
- 3.3. *act in partnership with those receiving care, helping them to access relevant health and social care, information and support when they need it.*

6. *Always practise in line with the best available evidence*

To achieve this, you must:

- 6.1. *make sure that any information or advice given is evidence-based, including information relating to using any health and care products or services.*
- 6.2. *maintain the knowledge and skills you need for safe and effective practice.*

7. *Communicate clearly*

To achieve this, you must:

- 7.1. *use terms that people in your care, colleagues and the public can understand.*
- 7.4. *check people’s understanding from time to time, to keep misunderstanding or mistakes to a minimum”.*

With the above in mind, we would expect the professionals involved in situations similar to Ella’s to be able to communicate clearly with the family, providing information that is evidence-based, and using this to manage their condition.

We will identify if there is further activity that we can do to make sure that the professionals on our register understand their obligations to communicate clearly to their patients about evidence related to the management and prevention of ill-health, and help prevent tragic cases such as Ella’s from occurring again.

Further information

I have shared our response to the Prevention of Future Deaths Reports with the GMC and Professor [REDACTED], Chief Medical Officer as part of a multi-agency meeting hosted by Dr [REDACTED] on 1 June 2021. At that meeting, we agreed to share our responses with Professor [REDACTED] and [REDACTED], Chief Nursing Officer for England, so that the Department and NHS England/Improvement can identify any common themes or joint work that the agencies can take forward together.

I would also like to share that, as part of our Five Year Strategy, we have identified the impact of climate change on respiratory diseases, and we will continue to monitor environmental impact on our work as a regulator.

I note that you have not mentioned concerns regarding individual professionals in your Report. If you believe there are specific concerns we should be considering, please let us know.

I hope this information provides you with information about our standards in nursing and midwifery education, and the steps we are taking to minimise the risk of future deaths occurring as a result of any potential gaps in the education of our professional standards for registered nurses, midwives and nursing associates.

Once more, I would like to offer my deepest sympathy to Ella's family and friends.

Yours sincerely



[REDACTED]
Chief Executive and Registrar

c.c. Professor [REDACTED], Chief Medical Officer, Department of Health and Social Care
[REDACTED]

[REDACTED], Chief Nursing Officer, England
[REDACTED]

[REDACTED], Chief Executive and Registrar, General Medical Council
[REDACTED]