



*Raising standards for consumers*

## POSITION PAPER

ANEC comments on the updated training requirements in rules recognising the professional qualifications of nurses, pharmacists & dental practitioners



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## INTRODUCTION

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This is an excellent initiative which deserves ANEC's strong support. Difficulties have arisen in drafting European standards that satisfactorily addressed issues of recognition of professional qualifications of clinicians; in our experience this was one of the key factors in the limited adoption of the work developed in the European standardisation committee CEN/TC 403 'Aesthetic surgery services'.

It is important that the requirements for knowledge and skills shall be aligned with the European Qualifications Framework (EQF) level scale.

## 1 | Balancing aspirations and realities in EU healthcare qualifications

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The draft is not very specific about exact training requirements. It could usefully be descriptive as to the sources of information of good practice, even if there will be various definitions of “best practice” across the EU.

There are already diverse requirements for clinician qualifications across the EU. This new EU legislative proposal has some good ideas in a difficult area. A central challenge is that if the legislation is too prescriptive then some Member States may be unable to accommodate their less rigorous specifications. But if the legislation is less precise then it may not achieve the objective of raising the quality of professional qualifications across less developed health systems. The draft directive gets round this difficulty by making its requirements aspirational, aiming for these “higher” level of qualifications will support compliance, without being prescriptive.

The pace of innovation in clinical research is such that new medical treatments and procedures will always co-exist. It will always be near impossible for all delivery of healthcare treatments and therapies across the whole of the EU to be at the level of best-known practice. There may be debate as to whether newer treatments are indeed better and not all innovations will be clearly better superior in the initial stages. Yet such advances will always have implication for training of clinicians. A further factor is that clinical advances can be associated with greater cost, particularly where complex equipment or expensive drugs are concerned.

As dentistry is specifically mentioned in this case, it is worth noting that this is an area where there are many new treatments and procedures, including surgical procedures, becoming available that are in unequal use across the EU on grounds of cost. There would appear to be no need for dental practitioners to be trained in providing treatments that are unlikely to be offered in their Member States, but with the current EU legislative proposal compliance could still be achieved by aspiring to its requirements.

## 2 | Specific comments on the text of draft Delegated Directive amending Directive 2005/36/EC

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We welcome the requirements for the ability to participate in adequate training in *Amendments to Directive 2005/36/EC* Article 1 (c) and (d). It is especially key that EU initiatives like EU4Health are leveraged to make this possible at national level, at a time when the health systems in the EU are strained by unprecedented challenges like shortage of healthcare workers, insufficient bed capacity, aging and growing population.

An additional aspect to consider is that better education regarding environmental issues would do great benefits in the sector.

### **2.1 Enhancing Healthcare Practices: Empowering Nurses and Ensuring Safety**

It is unclear what preventive medicine is going to cover in the *Annex under 5.2.1 Training programme for nurses responsible for general care - A. Theoretical instruction - "b. General health sciences"*. It is important for it to cover injury prevention as well. Large part of patients come for treatment due to injuries it is therefore important as part of the patients' education for the nurses to be able to give preventive information and understand how injuries happen and what can be done to prevent them.

### **2.2 Legal Awareness and Patient Rights**

In reference to *c. Social sciences: "Social and health legislation" and "legal aspects of nursing"*:

Nurses play a crucial role in healthcare delivery ANEC finds it essential that nurses understand their responsibilities within the legal framework and have familiarity with patients' rights.

In relation to "Occupational health and safety", We also express concern at the increase in aggression in hospitals against nursing and medical staff. Although this is not directly relevant to consumer protection, we recommend attention is given to training or education on this issue how professionals can protect themselves and their rights.

Comprehensive training should cover protection against work-related injuries that are many and these also include injuries caused to patients, such as misunderstandings of diagnoses or administration of wrong (concentration of) medicaments.

Vigilance and competence are critical to prevent such incidents. In this collaborative effort, nurses can champion patient well-being while safeguarding their own rights and safety.



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

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