

Do you agree that introducing a statutory requirement to apply evidence based workload and workforce planning methodology and tools across Scotland will help support consistent application?

Together for Short Lives is the UK children's palliative care charity that, together with our members, speaks out for children and young people who are expected to have short lives. This includes the 15,000 babies, children and young people with life-limiting and life-threatening conditions in Scotland (<http://bit.ly/2upJ4Yf>).

Children who need palliative care often have complex and unpredictable health conditions. They rely on qualified children's nurses with the right skills to manage their pain and the distressing symptoms they can experience.

Together for Short Lives therefore welcomes any workforce planning policies that will improve the quality and safety of care and we support the Royal College of Nursing's (RCN) call for guaranteed safe and effective nurse staffing levels in Scotland (<http://bit.ly/2tpOdiV>).

We support the RCN's view that the safe staffing legislation must do more than just state that the Nursing and Midwifery Workload and Workforce Planning (NMWWP) tools are to be used, as these should already be used by NHS boards in Scotland. It is crucial that the Bill sets out how organisations that fail to meet safe staffing levels will be held to account and supported to implement safe staffing levels.

We are concerned that this legislation may inadvertently encourage ward closures if hospitals are unable to fill their safe staffing quota, which will lead to longer waiting lists. This not only limits capacity, but can also damage patient confidence as the continuity of their care is interrupted due to a ward closure. This can be particularly worrying for parents, who are often already distressed due to their child being in hospital.

Crucially, this legislation must connect workload and workforce planning to future workforce strategies. Organisations must be open and honest about any difficulties they face meeting their safe staffing obligations, including whether this is attributable to a shortage of available nurses or funding to pay for them. This should then feed in to future health workforce strategies in Scotland so that these gaps can be addressed and organisations are able to fulfil safe and effective staffing levels. There is no purpose in these levels simply being aspirational. They must be achievable and workforce planners must be given the tools to ensure that future needs are met.