



The Royal College of Midwives
15 Mansfield Street, London, W1G 9NH

RCM response to:

- **The Standards for Education and Training (SETs)**
- **The Operating Framework**
- **The Standards for the Equivalence Route (SER)**

Thank you for giving us this opportunity to comment on the draft standards. Unfortunately we have not had capacity to respond as fully as we would have liked to all three consultations. Our response has been additionally hindered by the short duration permitted to respond. The two weeks permitted has included two weekends and two public holidays, a loss of six days. We hope that you can ensure that HEE consultations are left open for longer to allow proper deliberation and discussion amongst stakeholders. We also note there is no link to these consultations on the HEE website itself!

The RCM notes that the terms used in the documents refer to level of academic achievement as pre-determinants of achievement: Level 7 for Advanced clinical practice (ACP) and level 8 for Consultant level practice. Whilst some of our Consultant midwife members may have attained level 8 credits and doctoral awards, these have generally been achieved since entering their consultant post. We would not support a process that would disadvantage our members in Consultant midwife posts that have not required the award of a doctorate to take up post not to be eligible for recognition should they apply through the equivalency route. We hope that these Standards and the Operating Framework can be reconsidered to allow for this so the RCM can support this initiative.

Royal College of Midwives
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