



Bucharest, 4th of October 2017

**To HE Minister of Health Andreas Xanthos
Ministry of Health of Greece**

Dear Minister,

Recently, we have been informed by the Hellenic Regulatory Body of Nurses (ENE), member of the Executive Board of the European Nursing Council, that you are preparing a bill on nursing. We've read its provisions with great interest and would like to bring to your attention the following remarks:

Undoubtedly, we welcome your good intentions in regulating the profession of nursing, the largest healthcare provider group and a key Science Resource for Europe's Public Health, especially now that it is overburdened by new challenges for the health sector such as terrorism and migration.

However, we would like to point out our concerns regarding the bill entitled "Regulations for the Hellenic Regulatory Body of Nurses and the Nursing professional field, subjected to public consultation, as follows:

We are afraid that the provisions of the bill are not clearly defined and this will undoubtedly cause much confusion among nurses and other health-care professionals working in the health services sector. In particular, the confusion arises from the provisions that require the registration in the Register of the Hellenic Regulatory Body of Nurses (ENE) of other professional categories, except for nurses, and from those provisions which define the establishment of a professional field for the nursing staff, comprising nurses, midwives and nursing assistants.

At this point, it should be recalled that under the Directive EC 2005/36, as amended by the Directive EU 2013/55, the title of "Nurse Responsible for General Care" and the corresponding professional qualification are recognized and awarded under specific theoretical and clinical training conditions. It is also stated that the qualification of the "Nurse Responsible for General Care" proves that the practitioner in question is capable of carrying out specific actions, making use of his or her theoretical and clinical knowledge. In light of the above, it is clear that the specific training of the title "Nurse Responsible for General Care" is harmonized at the

European level, and it clearly distinguishes this qualification from other health professional qualifications in the healthcare sector.

In our view, the provisions of the bill as it currently stands, may create inconsistency between the Greek intended legislation and practice with the general framework for the recognition of professional qualifications as developed by the European Union.

Therefore, given the important and consequential nature of nursing on public health, we consider any attempt to partially or completely assimilate Nurses Responsible for General Care with other health professionals a confusing and heterogeneous implementation of the EU Directives.

After the recent meeting of the Nursing Regulators of the EU Member States that took place in Dublin on 21-22 of September in order to define a European "Nursing Act", where the nurse is identified as an autonomous scientist and an independent health-care professional, we are concerned that this legislation would serve against the initial objective and would be a step back for the healthcare system.

We now hope that you take the necessary steps to protect the profession of nursing, thereby fulfilling a greater obligation to safeguard public health and safety.

Please accept, dear Minister, the assurances of my highest consideration.

Sincerely yours,

Mircea Timofte

President

A handwritten signature in blue ink, appearing to be 'M. Timofte', written over the printed name and title.