



H. N. N. A.
Hellenic National Nurses Association



Mr. Adonis Georgiadis

15th April 2024

Minister of Health

Email: minister@moh.gov.gr

Concern: Nurses' education (Directive 2005/36/EC & Directive 2013/55/EU on Mutual Recognition of Professionals Qualifications) and EU Health Workforce Strategy – EPSCO meeting.

Dear Minister of Health,

We are writing to you today for two major key points for the whole nursing profession in the EU, and in particular for our nurses in Greece.

Prior to the Informal meeting of the health ministers (EPSCO), taking place in Brussels on 23-24 April 2024, the Belgium EU Presidency will present draft Council Conclusions that will link to the EU Health Workforce Strategy and in particular the analysis of the EU legislation that supports the free movement of the sectoral healthcare professionals in the EU, including nurses.

We, the Hellenic National Nurses Association and the European Federation of Nurses Associations, representing the nurses at EU level, of which we are a member, supports the co-design of a future EU Health Workforce Strategy, and welcome the WHO upcoming study (from DG Sante Public Health Programme) on the recruitment and retention of nurses, with a specific focus on nurse-patient ratios as one option towards achieving safe staffing levels in the EU. Safe nurse staffing is an incentive to attract nurses, helping recruitment and retention, and reducing the reliance on unethical recruitment practices, such as the inappropriate recruitment of overseas' nurses, contrary to the principle outlined in the WHO Code on Ethical Recruitment of Health Personnel¹.

But, we are very concerned that the free movement of nurses in the EU will be compromised if “we throw away the Directive 2005/36/EU, revised by Directive 2013/55/EU, with the bathwater”. We are concerned that patient safety will be at risk if the EPSCO Ministers of Health downgrade the nurses' education, being as such not in compliance with the Directive. As you know, a Delegated Act on the revision of the Annex V, will soon be published, which will strengthen the nurses' curriculum with key topics, as person centered care theories, management theories applied to nursing, evidence-based practice, eHealth & digital skills, and technical innovations related to healthcare and nursing methods.

It is therefore crucial to bring to your attention that lowering down the nurses' curriculum to for example 3.800 hours, so that these nurses do not fall under the Directive 2005/36/EC requirement of 4.600 hours, is limiting the EU key principle of free movement of people. It is possible that the Universities and Higher Education Institutes would not consider this diploma due to the reduction in ECTS credits. Furthermore, the lowering down the qualification of the nurses is against all the evidence produced over the last 3

¹ <https://www.who.int/publications/i/item/wha68.32>

decades, that shows that the reduction of education of nurses with 10% is increasing the mortality of patients by 7% (Aiken, 2023). Therefore, it is crucial to invest in the education/training and Lifelong Learning (LLL)/Continuous Professional Development (CPD) of our domestic higher educated nurses. Ensuring appropriate education and qualifications of our nurses and allowing opportunities to advance the nursing profession are key to guaranteeing the sustainability of the health and social care ecosystems and ensuring the willingness of young people to choose nursing as a career path. We need highly educated and motivated nurses who safeguard citizens through the healthcare system, and who are present at the patients' bedside and close to the citizens 24 hours/day, 7 days/week!

It is central that national governments of the European Union make sure that their health systems have the necessary nursing workforce, with the necessary competences, to provide high-quality and safe healthcare services to its population. The nursing shortage crisis cannot be solved by lowering down the qualifications of nurses and the unethical recruitment and migration by "Robbing Peter to Pay Paul". The future health system builds in multi-disciplinarity and digitalisation to empower patients and citizens, and the 8 competencies in the EU law provides the foundation for that future.

The health and safety of the patient is crucial, especially in these very difficult times. If we want to be better prepared for the next health crisis, in whatever format it will come to us again, do not lower down the qualifications of the nurses! Patient safety and quality of care are inextricably linked with current Directive 2005/36/EC, revised by Directive 2013/55/EU, and the upcoming Delegated Act updating the Annex V.

Wish you all the best in the upcoming EPSCO meetings focussing on the EU Workforce for Health.

Best Regards,

Eleni Koukoulari-Kyritsi
President
Hellenic National Nurses Association

Paul De Raeve
Secretary General
European Federation of Nurses Associations

For your information:

The Hellenic National Nurses Association (H.N.N.A.) was founded in 1923 and became a member of the I.C.N. in 1929. It is a scientific professional Association. Its main purpose is the promotion and development of Nursing profession for achieving solidarity among the Greek nurses, mutual understanding, and support as well as the promotion of the authority of the nursing profession.

H.N.N.A. cooperates with ICN, EFN, EONS, EfCCNa, Greek Specialist Nurses' Societies, Universities and Educational Institutes.

H.N.N.A.'s administrative function includes Regional Branches in the North and South of Greece.

To the frame of its activities, H.N.N.A. establishes Sectors of Nurse-Specialists. Website: www.esne.gr

The European Federation of Nurses' Associations (EFN) represents over 36 National Nurses' Associations and its work impacts on the daily work of 6 million nurses throughout the European Union and Europe. The EFN is the independent voice of the nursing profession and its mission is to strengthen the status and practice of the profession of nursing for the benefit of the health of the citizens and the interests of nurses in the EU & Europe. For more information visit EFN Website: www.efn.eu