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Unite the union response to the Department of Health & Social Care (DHSC) Open call for evidence - Using the professional title 'nurse'

Introduction

This consultation response is submitted by Unite the union - Britain and Ireland largest trade union. Unite's members work in a range of industries including manufacturing, transport, financial services, print, media, construction, not-for-profit sectors and public services.

Unite is the third largest trade union in the NHS and represents 100,000 health sector workers. This includes seven professional associations – the Community Practitioners and Health Visitors' Association (CPHVA), Guild of Healthcare Pharmacists (GHP), Medical Practitioners Union (MPU), Society of Sexual Health Advisors (SSHA), Hospital Physicists Association (HPA), College of Health Care Chaplains (CHCC) and the Mental Health Nurses Association (MNHA) – and members in occupations such as allied health professions, healthcare science, applied psychology, counselling and psychotherapy, dental professions, audiology, optometry, social work, building trades, estates, craft and maintenance, administration, information and communications technology (ICT), support services and ambulance services.

Unite also has 80,000 members in local authorities and 50,000 in the voluntary and community sector many of whom work in services directly involved with or linked to health and social care.

The following response was submitted via the DHSC online survey that was available for completion between 30 July and 8 October 2026 via: https://consultations.dhsc.gov.uk/using-the-professional-title-nurse.

Consultation response

About you - In what capacity are you responding to this survey?

An individual sharing my own views and experiences
On behalf of an organisation ✅

Questions for organisations

What is the name of the organisation you are submitting evidence for? Unite the union

What type of organisation are you responding on behalf of? (Select all that apply)

Academic institution

Business
Not for profit organisation
Professional regulator
Public sector body
Other ✅ **Please specify:** Trade union

Where does your organisation operate or provide services?

England
Wales
Scotland
Northern Ireland
The whole of the UK ✅
Outside the UK ✅

What sector does your organisation fall within?

Academic
Advocacy
Armed forces
Beauty and cosmetic
Education, including childcare
Emergency services
Health and care
Local government
National government
Social care
Sport
Transport
Veterinary
Other ✅ **Please specify:** Trade union

Does your organisation have any registered healthcare professionals or protected titles that are regulated by a professional healthcare regulator?

Yes ✅
No

Which professional healthcare regulators are your organisation's registered professionals or protected titles registered with?

General Chiropractic Council (GCC) ✅
General Dental Council (GDC) ✅
General Medical Council (GMC) ✅
General Optical Council (GOC) ✅
General Osteopathic Council (GOsC) ✅

General Pharmaceutical Council (GPhC) ✅
Health and Care Professions Council (HCPC) ✅
Nursing and Midwifery Council (NMC) ✅
Pharmaceutical Society of Northern Ireland ✅

In your organisation, what profession is currently or was previously registered with the General Chiropractic Council (GCC)?

Chiropractor ✅
Other

In your organisation, what profession is currently or was previously registered with the General Dental Council (GDC)?

Clinical dental technician ✅
Dental hygienist ✅
Dental nurse ✅
Dental technician ✅
Dental therapist ✅
Dentist ✅
Orthodontic therapist ✅
Other

In your organisation, what profession is currently or was previously registered with the General Medical Council (GMC)?

Anaesthesia associate ✅
Medical practitioner ✅
Physician associate ✅
Other

In your organisation, what profession is currently or was previously registered with the General Optical Council (GOC)?

Dispensing optician ✅
Optometrist ✅
Student dispensing optician ✅
Student optometrist ✅
Other

In your organisation, what profession is currently or was previously registered with the General Osteopathic Council (GOsC)?

Osteopath ✅
Other

In your organisation, what profession is currently or was previously registered with the General Pharmaceutical Council (GPhC)?

Pharmacist ✅
Pharmacy technician ✅
Other

In your organisation, what profession is currently or was previously registered with the Health and Care Professions Council (HCPC)?

Arts therapist ✅
Biomedical scientist ✅
Chiropodist or podiatrist ✅
Clinical scientist ✅
Dietitian ✅
Hearing aid dispenser ✅
Occupational therapist ✅
Operating department practitioner ✅
Orthoptist ✅
Paramedic ✅
Physiotherapist ✅
Practitioner psychologist ✅
Prosthetist or orthotist ✅
Radiographer ✅
Speech and language therapist ✅
Other

In your organisation, what profession is currently or was previously registered with the Nursing and Midwifery Council (NMC)?

Midwife ✅
Nursing associate ✅
Registered nurse ✅
Other ✅ **Please specify:** Specialist community public health nurse (SCPHN)

In your organisation, do you have any professionals who are currently or were previously registered as any of the following?

Health visitor ✅
Occupational health nurse ✅
Family health nurse ✅
School nurse ✅
Or
None of the above

In your organisation, what profession is currently or was previously registered with the Pharmaceutical Society of Northern Ireland?

Pharmaceutical chemist ✅
Other

Your views on use of the professional title 'nurse'

The government wants to ensure that those using the title 'nurse' are legitimate healthcare professionals. However, we are aware that the term 'nurse' is currently used in the titles of several other professions.

The next questions seek your views on which roles or people should be allowed to use the word 'nurse' in their title and therefore be exempt from prosecution. They also seek your views on protecting other professional titles such as 'nursing' and 'health visitor'.

What roles do you think should be allowed to use the word 'nurse' in the title and therefore be exempt from prosecution? (Optional) Please state the job titles and briefly describe the roles and reasons for exemption. Maximum 500 words.

- Any nursing role that requires registration with the Nursing & Midwifery Council (NMC), including nursing associates in England.
- Any dental nurse role that requires registration with the General Dental Council (GDC).
- Any veterinary nurse role that will, in future, require registration. Please see 'further information' for additional narrative on this response.
- Community nursery nurse – primarily work as members of teams across health visiting and/or school nursing.
- Nursery nurse – primarily looking after pre-school children in nurseries or other relevant facilities, for example in NHS hospitals.

In respect of the two general groups of nursery nurses identified above, we believe that there is an argument that these roles should be exempted as they are well established over a long period of time. In fact, from the information shared by the government, it appears that this is already expected to be the case[i]. We do however believe that to ensure these roles are then not used as a route for people to undermine this exemption, urgent work is needed to look at regulating these roles, including mandating the minimum level qualifications that are required to be able to hold these roles. Unite/Community Practitioners' & Health Visitors' Association (CPHVA) has long argued that the public should be protected by regulating community nursery nurses and we would welcome further discussions with the government on this point.

Like nursing roles, we also recognise that there are several nursery nurse titles used that have other words included in them. For example, we have members who report their job title is public health nursery nurse. We believe that as long as these titles are not an attempt to mislead the public, they should be exempted.

Please specify any other roles that do not include the term 'nurse', which you think should also be granted protected title status under the Nursing and Midwifery Council's (NMC) governing legislation, for example 'health visitor'. (Optional) Please state the job titles and briefly describe the roles and your reasoning. Maximum 500 words.

Health visitor – Whilst the role of 'health visitor' is currently afforded some level of protected title, as the registrable qualification with the NMC leading to the registration, 'specialist community public health nurse (SCPHN)', is currently a protected title, we would argue the position today is as indefensible as that for 'registered nurse' versus 'nurse' which the government's 'Plan For Change' correctly hopes to address[ii].

Health visitor is a title that is understood by members of the public and whilst they may not be able to define the fact that to be able to become a registered specialist community public health nurse (health visitor) requires a prior registration as a nurses and/or midwife and a master's degree, they will expect a certain level of qualification, and regulation/oversight, to be able to carry out this highly specialist role.

One of the unintended consequences of protecting the title nurse, which would stop the opportunity for 'fake' nurses[iii] to be able to advertise their role whilst having no medical qualifications, could be that, for example, those currently calling themselves 'maternity nurses' swap to calling themselves health visitors unless this title is similarly protected. This could therefore have the reverse impact and put members of the public at increased risk.

Members also highlighted that there can be some confusion caused by employees introducing themselves as working in, for example, the health visiting team, whilst not themselves being a registered specialist community public health nurse. We hope that any legislation would also help to clear up this current potential confusion.

Do you think any other job titles that include the word 'nursing' or other variations of the word 'nurse' should be granted protected title status under the Nursing and Midwifery Council's (NMC) governing legislation? (Optional)

Yes ✅
No
Don't know

Please explain your reasoning, including specific job titles or roles if applicable. (Optional) Maximum 500 words.

School nurse – Whilst we recognise that the situation in respect of school nurse will be improved if the 'nurse' title is protected we do believe further consideration is needed.

The current unacceptable situation is that anyone can call themselves a school nurse whether they are a registered nurse or not. If the title of nurse is protected, we would expect that this will mean someone can only call themselves a school nurse if they are on the NMC register as a nurse. Whilst we expect it is outside the scope of this work, we do believe there needs to be safeguards put in place to make clear where a school nurse has

the registerable qualification on the specialist community public health nurse part of the register versus where a registered nurse, or in future a nurse, works in a school. It maybe that this could be more appropriately covered in the current work by the NMC on its direction towards regulating advanced practice[iv]. We do however believe that as a minimum, maintaining the specialist community public health nurse part of the NMC register is paramount unless a better option to protect the public in terms of school nursing is developed and implemented.

Nursing associate (outside of England) – The call for evidence document states[v]: "Protected title status means it is a criminal offence for anyone to use these titles unless they are entitled to do so under NMC's legislative framework. In the case of the title 'nursing associate', the offence applies in England only; accordingly, its use in Northern Ireland, Scotland and Wales does not constitute an offence." Whilst recognising that the NMC has asked for the powers to regulate nursing associates in Wales[vi] we believe it is important that there are appropriate safeguards in place to ensure there are no loopholes.

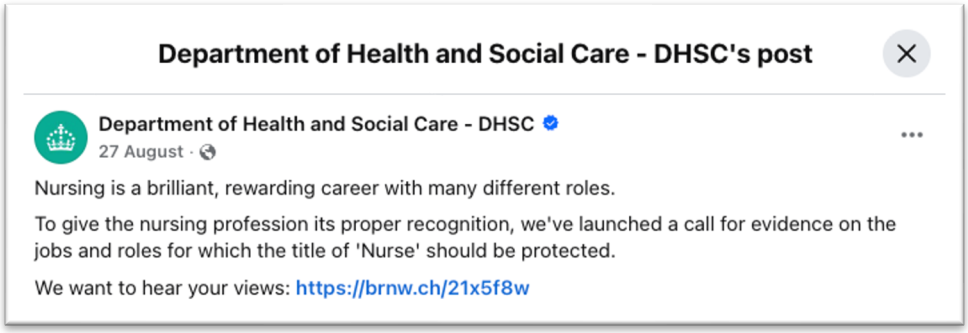
We believe if there is currently, or in future, a risk that someone could call themselves a nursing associate in Scotland and Northern Ireland and not face sanction, this should be closed as a possibility. We imagine this could either be done by protecting the title nursing associate across the UK or if the loophole would be closed by protecting the title nurse across the UK and have no provision for using nursing associate in Scotland or Northern Ireland.

Please provide any further information and evidence relating to protecting the professional title 'nurse' and exemptions. (Optional)

The primary goal of protecting titles must be to prevent, as much as is possible, public harm from under/unqualified people masquerading as people with a perceived level of qualification, expertise, oversight and regulation. Unite has argued the need to protect the nurse title for several years[vii] and we therefore welcome the current efforts by the Government.

We feel it necessary to highlight a concern in the way that the Department of Health and Social Care 'advertised' the consultation on social media. On 27 August 2026, the DHSC stated on its Facebook page[viii] (alongside a video):

Nursing is a brilliant, rewarding career with many different roles. To give the nursing profession its proper recognition, we've launched a call for evidence on the jobs and roles for which the title of 'Nurse' should be protected. We want to hear your views: https://brnw.ch/21x5f8w



Whilst we agree nursing is a brilliant and rewarding career, and nurses should be recognised for the roles they perform, title protection is not about recognition. As already stated, it is about public protection. We regularly highlight and argue for ways the DHSC can correctly recognise nurses.

Veterinary nurse – additional narrative

We recognise the current position that 'veterinary nurse' is not a protected title. However, we hope this position will change in advance of, or alongside, the legislative processes required to protect the title 'nurse'.

In our response[ix], led by Unite/British Veterinary Union (BVU), to the recent consultation held by the Department for Environment Food and Rural Affairs (DEFRA) on Reform of the Veterinary Surgeons Act 1966, we expressed our continued belief that it is 'very important' for the professional titles of veterinary nurses and allied veterinary professionals to be legally protected (L2PQ8).

Our response included: "The BVU believes that this is vital to ensure that only registrants are carrying out tasks that are deemed inappropriate for lay persons. This will increase clarity from members of the public, increase trust in the Veterinary professionals, and it will increase the quality of care provided to animals and their owners. This has been a long-term demand of the BVU, and it is very welcome that it is in this legislation."

We note in the summary of responses to the consultation[x], 91% of respondents agreed with us that it was 'very important' and 6% 'fairly important'. We further welcome the stated future policy of the government that all veterinary professionals will require a licence to practise under a reformed Veterinary Surgeons Act[xi]. This will not only positively impact the treatment of animals but also ensure a potential loophole with protecting the title 'nurse' will also be closed.

PLEASE NOTE DUE TO THE RESTRICTIVE WORD COUNT WE HAVE BEEN UNABLE TO INCLUDE THE REST OF OUR RESPONSE TO THE CALL FOR EVIDENCE. WE PROVIDED ADDITIONAL INFORMATION ON TWO FURTHER AREAS: Future proofing for any changes to how Nursing & Midwifery Council registrants remain and/or revalidate on the register & Reviewing job descriptions in Unite membership. YOU CAN SEE OUR FULL RESPONSE ON OUR CONSULTATION RESPONSE WEBSITE: https://www.politicshome.com/news/article/unite-responses-to-consultations. THIS INCLUDES THE REFERENCES USED THROUGHOUT OUR RESPONSE.

Future proofing for any changes to how Nursing & Midwifery Council registrants remain and/or revalidate on the register

Nursing remains the largest body of registered professionals in the UK.

The expertise our members bring to health services and to the public health is unique, self-organised, evidence based, and strictly within regulated frameworks of practice fully accountable to the public.

We are clear that this expert standard of professional practice must be protected and assured for the future, so that nurses continue to drive the development and evolution of their own profession and practice standards.

Any watering down of these standards undermines the profession, resulting in poor practice and creates a measurable and known risk to the health of the public.

Unite the union as a trade union and professional organisation will continue to ensure our nurse and nurse associate members are empowered to reject weakening of their professional status, and to always prioritise patients and the public health through highly skilled expertise at all levels and with all types of nursing practice.

The current situation allows for registered nurses to remain on the register in a range of, what could be argued are flexible situations. If this were amended and/or limited in future, for example, if in future a registered nurse could only revalidate if they had 'direct patient contact' for a particular amount of time, then it would lead to more registrants having to leave the register and therefore could be impacted by the changes being suggested.
As an example, it could lead to some senior nurse lecturers no longer being able to register.

Whilst we accept there is no current proposals for any changes to the NMC register that would lead to this potential situation we wonder whether it should be made clear what would happen if this ever was the case? For example, making clear that any changes would include consideration on whether any new legislation developed on this issue would need to be reconsidered.

Reviewing job descriptions in Unite membership

In preparation for writing this response, we reviewed our membership system for any job descriptions that included the word nurse/nursing. Of 206 different job descriptions 83% were roles that required a nursing registration with the NMC. 3% were roles that required a dental nurse registration with the GDC, 3% were roles that would require a veterinary nurse registration in future. 7% were roles that related to working either as a community nursery nurse in the health sector or in a nursery. Each of the job descriptions stated above have at least one member in them, with the most populous having tens of thousands of members covered by the job description. The remainder of between 3% and 4% may have a role that would be impacted by these planned changes.

08/10/2026

This consultation response was submitted on behalf of Unite the union by:

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[i] https://www.gov.uk/government/news/fake-nurse-crackdown-to-boost-public-safety#:~:text=The%20department%20will%20also%20establish%20the%20exemptions%20where%20%E2%80%98nurse%E2%80%99%20can%20still%20be%20used%20as%20part%20of%20a%20professional%20title.%C2%A0

[ii] https://www.gov.uk/government/news/fake-nurse-crackdown-to-boost-public-safety

[iii] https://www.lbc.co.uk/article/fake-nurses-steve-bruce-crackdown-5HjdfKM_2/

[iv] https://www.nmc.org.uk/standards/future-standards/advanced-practice-review/

[v] https://www.gov.uk/government/calls-for-evidence/using-the-professional-title-nurse/using-the-professional-title-nurse-call-for-evidence-document#:~:text=associate%20(England%20only)-,Protected%20title%20status,-means%20it%20is

[vi] https://www.nmc.org.uk/news/news-and-updates/council-approves-regulation-of-nursing-associates-in-wales/

[vii] https://www.politicshome.com/ugc-1/1/36/0/unite_response_to_nmc_public_consult.pdf

[viii] https://www.facebook.com/reel/4027139787590485/

[ix] https://www.politicshome.com/ugc-1/1/36/0/March%202026_Unite%20BVU%20response%20to%20DEF.pdf

[x] https://www.gov.uk/government/consultations/reform-of-the-veterinary-surgeons-act-1966/outcome/summary-of-responses-and-government-response#:~:text=multi%2Ddisciplinary%20teams-,L2PQ8,-.%20To%20what%20extent

[xi] https://www.gov.uk/government/publications/our-vision-for-a-thriving-veterinary-sector/our-vision-for-a-thriving-veterinary-sector#:~:text=in%20other%20professions.-,A%20licence%20to%20practise,-Under%20a%20reformed