Homecare Association

Using the professional title 'nurse'

Submitted below on 8th October 2026

The Homecare Association responded to the Department of Health and Social Care's call for evidence on the use of the professional title "nurse". The consultation explored whether legal protection should be extended beyond the title "registered nurse" and sought views on which roles should be permitted to use the term "nurse" in their job title. The government's stated aim is to strengthen public protection and reduce the risk of people being misled about an individual's qualifications or professional status.

Read more: Using the professional title 'nurse'

Q1. 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.

The Homecare Association supports the principle of protecting the title 'nurse'. People receiving care should be able to have confidence that an individual using the title has the appropriate professional qualification, meets the required standards and, where applicable, is registered with the Nursing and Midwifery Council (NMC).

We recognise that there are some established uses of the word 'nurse' which are distinct from the professional role of an NMC-registered nurse. Any exemptions should be narrow, clearly defined and based on a consistent set of principles. Exemptions should consider whether a title has an established meaning, whether it is clearly distinguishable from the role of an NMC-registered nurse, and whether there is a realistic risk of public confusion.

We recognise the established use of titles such as 'dental nurse' and 'veterinary nurse', which operate within distinct professional and regulatory frameworks. Similarly, long-established titles such as 'nursery nurse' are unlikely to imply that an individual is an NMC-registered nurse.

Of particular relevance to homecare is the distinction between registered nurses and the wider care workforce. Care workers provide vital support to people in their own homes, including people with complex health and care needs. They may also undertake healthcare activities that have been appropriately delegated by a registered healthcare professional and for which they have received appropriate training and support. This does not make them nurses, and legislation should make this distinction clear.

We do not support the use of 'nurse' as part of job titles for unregistered social care workers where this could give people receiving care the impression that the individual is an NMC-registered nurse. At the same time, any protection regime should recognise that registered nurses working in social care do not always have the word 'nurse' in their job title. Providers may use titles such as 'Clinical Manager', 'Clinical Lead' or 'Clinical Governance Lead' for roles undertaken by NMC-registered nurses. These titles often reflect the broader leadership, governance, training and quality assurance responsibilities associated with nursing roles in social care. Protection of the title 'nurse' should not create uncertainty about the legitimacy of such roles or restrict employers' ability to recruit and retain registered nurses within the sector.

Title protection should not inadvertently restrict providers from accurately describing the services they deliver. Where registered nurses are employed to provide nursing care, providers should remain able to use terms such as 'nursing care', 'nursing services' and 'nursing-led support' to describe those services.

There is also a need for clarity in relation to internationally recruited nurses who are working in social care while completing the requirements for NMC registration. Providers need clear and consistent national guidance on what titles these individuals can use at different stages of the registration process. This is particularly important given the reliance of many homecare providers on an internationally recruited workforce.

We support clear protection of the professional title 'nurse', provided that the resulting framework is proportionate and gives providers and the wider social care workforce sufficient clarity about what is and is not permitted.

Q2. Are there any other professional titles that should be protected?

We recognise the importance of ensuring that professional titles are used accurately, particularly where a title could lead people to believe that an individual holds a particular qualification, registration status or level of specialist expertise.

There are a number of established nursing titles, including titles such as 'District Nurse', 'Health Visitor' and 'School Nurse', which have specific professional meanings. There may therefore be a case for considering whether some additional titles should be protected where their use could create a reasonable expectation of particular qualifications or specialist expertise.

However, the Homecare Association has not undertaken sufficient member engagement on this specific question to take a definitive position on which additional titles should be protected. We would therefore encourage the government to consider any extension of title protection carefully and to assess the evidence of public confusion or potential harm associated with the misuse of particular titles.

Any additional protected titles should have clear eligibility criteria and a clear explanation of what the title signifies. The government should also consider the implications for the wider health and social care workforce, including providers operating across organisational and professional boundaries.

The objective should be to improve public understanding and protection without creating unnecessary complexity for employers, workers or people drawing on care.

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

The practical implications of any changes will be particularly important for homecare providers.

Homecare workers increasingly support people with complex health conditions and may undertake delegated healthcare activities as part of an individual's care and support. Clear guidance will be needed to ensure that title protection does not create uncertainty about what appropriately trained and supported care workers can do. Undertaking a delegated healthcare activity should not, in itself, imply that an individual holds the professional status of a nurse.

It is also important that the legislation distinguishes between protection of an individual's professional title and the accurate description of services. Providers delivering nursing care through registered nurses should be able to continue to describe their services accurately, including through terms such as 'nursing care' and 'nursing services'.

Any changes will also have practical implications for providers. Organisations may need to review and amend job descriptions, employment contracts, recruitment materials, websites, policies, digital systems and other communications. The government should therefore provide clear guidance and a realistic implementation period, with particular consideration given to the capacity of smaller providers.

We would also encourage a proportionate approach to enforcement. The primary purpose of title protection should be to prevent deliberate or misleading use of professional titles and protect people receiving care. Enforcement should distinguish between intentional misrepresentation and inadvertent administrative errors, particularly during any transition period.

Finally, legislation alone will not resolve all potential confusion about different roles within health and social care. Public-facing information should help people understand the distinction between registered nurses, nursing associates and care workers, including where care workers undertake delegated healthcare activities.

The Homecare Association supports the overall objective of ensuring that people receiving care can have confidence in the professional titles used by those providing their care. Any reforms should be implemented in a way that strengthens public protection while providing clarity for providers and the wider social care workforce, and allowing providers to describe their services accurately.

The government should consider the impact of any reforms on existing nursing roles within social care that use alternative clinical or management titles. Guidance should make clear that title protection does not prevent registered nurses from working under job titles that better reflect leadership, governance, case management or service development functions, provided there is no risk of misleading the public about qualifications or registration status.