

## Royal College of Nursing response to the Department for Education consultation on Lifelong Loan Entitlement

*With a membership of close to half a million registered nurses, midwives, health visitors, nursing students, health care assistants and nurse cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and European political institutions, trade unions, professional bodies, and voluntary organisations.*

### 1. Summary of RCN concerns regarding the Lifelong Loan Entitlement scheme

- 1.1. The RCN supports the intention of the UK Government's stated vision, as set out in the Lifelong Loan Entitlement (LLE) consultation document,<sup>i</sup> to "give people the opportunity to study, train, retrain and upskill throughout their lives to respond to changing skills needs and employment patterns which is key to breaking the cycle of lower skills and lack of opportunity which affects some communities."
- 1.2. Given that many people do not have the opportunity to undertake a full-time degree, offering more modular study options is positive because these can support people who want to undertake part-time degree.
- 1.3. The RCN is supportive of policies which encourage and support a wider range of people to access and undertake a nursing degree or qualification, and for nursing staff to top up their learning, retrain, upskill, and complete qualifications. However, the RCN is clear that increasing access to loans in England will not be sufficient to address the central issue that too few registered nurses are being trained in the UK to meet the current or future health and care needs of the population. Furthermore, nursing students and nursing staff should not have to rely on loans to fund their education and development - nursing is a safety critical profession and requires a separate, sustainable funding stream to ensure that there are enough nursing staff, with the right skills and training to deliver safe and effective care.
- 1.4. The RCN position is that the Government must remove every barrier preventing anyone who wants to from becoming a registered nurse via the primary route (the three-year pre-registration degree), including financial disincentives, in England. Now is the time to grow the domestic workforce supply to ensure there are the right number of registered nurses and health care support staff that are needed to deliver safe and effective care in every setting, in both health and social care, across the country.
- 1.5. Furthermore, whilst acknowledging the financial constraints facing health and care organisations, the RCN believes that Continuing Professional Development (CPD) and lifelong learning opportunities should be provided to health care support workers and nursing staff to upskill, retrain and/or top up existing qualifications, to continue to develop supporting delivery through a safety critical workforce, without them having to take out a loan to pay for them. CPD and lifelong learning is crucial

to foster continuous improvement, innovation, workforce development, and to ensure safe and effective care and improved health outcomes for service users.

## 2. Increasing the supply of nursing staff

- 2.1. The UK Government has a particular requirement to address nursing supply via higher education in England as policy has not generated the increase in supply needed. .
- 2.2. There are currently around 40,000 (39,652 as at December 2021) registered nurse vacancies in the NHS in England – a rate of 10.3%.<sup>ii</sup> Whilst this is down 0.2% on the previous quarter, the vacancy rate is showing no sign of significant decline and the decrease is lower than expected for the time of year. A smaller decrease in the nurse vacancy rate between Q2 and Q3 (September to December) in 2020 and 2021 suggest that the boost from new graduates joining the workforce has not made a similar impact to number of vacancies as in previous years. This could indicate that higher than expected number of nurses are leaving, that fewer nursing graduates are joining, or that there is a combination of both factors.
- 2.3. International recruitment continues to be pivotal to UK Government and devolved administration plans to fill health and care workforce vacancies.<sup>iii</sup> By September 2021, 17% (131,640) of those on the Nursing and Midwifery Council (NMC) register were internationally educated nurses.<sup>iv</sup> However, there is a global health workforce crisis and estimates indicate the global nursing shortage at 5.9 million nurses<sup>v</sup>, predominantly (89%) in low and lower-middle income countries.<sup>vi</sup> It is therefore vital that all international recruitment is conducted ethically and in accordance with the UK and WHO Codes of Practice.<sup>vii</sup> It is also crucial to provide consistent approaches to funded CPD allocation for this group of nursing staff, with ongoing recognition of prior skills and competence on employment.
- 2.4. Concerns are being raised that international recruitment by some high-income countries during the pandemic, could undermine the ability of some source countries to respond effectively to the pandemic.<sup>viii</sup> The RCN is concerned by the number of nurses joining the NMC register from countries identified by as having severe health workforce shortages where active recruitment is not permitted'.<sup>ix</sup> The UK should work to introduce bilateral agreements, with the involvement of national nursing associations, to ensure recruitment is mutually beneficial for these countries.
- 2.5. The UK Government's reforms to the funding and planning of nursing higher education in England from 2015 included moving from a centrally commissioned model of bursaries to study nursing to a 'market led' model where students pay their own fees, primarily through student loans, and, until recently, received no living grant support from the Government.<sup>x</sup>
- 2.6. The stated aim of these reforms was to increase the number of people studying nursing by 25%.<sup>xi</sup> However, from 2016 to 2020 there were three years of lower nursing admissions and acceptances. The RCN's analysis of data from the Universities and Colleges Admissions Service (UCAS) specifically looking at nursing courses leading to registration (and not wider professional nursing courses) shows that the number of applicants to pre-registration nursing courses in England decreased by 18% (8,300 fewer applicants between 2016 and 2020).

- 2.7. In 2020, the UK Government introduced a maintenance grant of £5,000. Using that same UCAS data we saw the number of accepted applicants rise in 2020. The 2020 intake saw an increase in the number of applicants and acceptances between 2019 and 2020 of 18% (from 31,700 in 2019 to 37,495 in 2020) and 27% (from 19,585 in 2019 to 24,805 in 2020) respectively.<sup>xii</sup>
- 2.8. The RCN's filtered UCAS data shows that in England in 2021, the number of acceptances increased by 1.2% (285 more acceptances) to 25,090. Following the pandemic, we expected the number of applicants to decrease and the 26 January deadline UCAS applications data confirmed this.<sup>xiii</sup> Between January 2021 and January 2022, the number of applicants to nursing courses at English universities decreased by 8.3%, from 36,410 to 33,410. We expect the 2022 whole cycle data to continue this trend.
- 2.9. Clearly, given the health and care workforce pressures, and the insufficient domestic pipeline, which can only be supported by a massive boost in both applications and acceptances. The UK Government must make use of all available levers to significantly increase new entrants. The RCN's assessment, based on the above evidence, is that when potential students are offered more financial support, they are more likely to come forward for nursing courses and the attrition rate would be more likely improve.
- 2.10. The annual living grant introduced in September 2020 has also demonstrated a clear link between financial support and retention. In response to a recent RCN survey of RCN student members, 81% of respondents who received the living costs grant for all their course were less likely to have considered dropping out compared to 62% amongst those who only received the grant for some of their course, and 67% who were not eligible for the grant at all.<sup>xiv</sup>
- 2.11. The RCN commissioned London Economics to model the illustrative costs of financial incentives and provided two different costed models to demonstrate that there are several options for delivery, including those which promote retention, and to demonstrate the affordability of government funding of nursing tuition fees. These models are outlined in our 2020 policy report: *Beyond the Bursary*.<sup>xv</sup> The RCN is currently updating this modelling to reflect recent developments in student loan arrangements which will disproportionately impact nursing graduates due to insufficient pay for nursing staff throughout their careers. The modelling will be shared with the Department of Education to help shape future developments in student financing.

### **3. Nursing degree apprenticeship route**

- 3.1. The RCN is supportive of the concept of an apprenticeship model as supplementary, not primary, route into the nursing profession. The RCN believes that the traditional three-year university route is best placed to begin to address the workforce crisis at the necessary pace and scale. The UK Government has acknowledged that nursing degree apprenticeships alone will not solve the nursing workforce crisis or improve access to nursing for those from disadvantaged backgrounds.<sup>xvi</sup> However, no one should be prevented from undertaking a nursing degree apprenticeship due to a lack of availability or take-up within the system.

- 3.2. The RCN has highlighted concerns about the general shortage of placement capacity for nursing students.<sup>xvii</sup> Introducing employer-led apprenticeships into the pre-registration education system has increased pressure on staff and the system to deliver high quality placements, especially when the existing nursing workforce is understaffed and overworked and must deliver care whilst also providing training and supervision to learners. The RCN is concerned that insufficient action has been taken by the UK Government to ensure there are enough staff who are properly trained to accommodate apprenticeships.
- 3.3. The NMC requires students to be additional to the staffing levels deemed necessary for safe care in any setting. This is referred to as having 'supernumerary status'. In practice, this means that apprentices cannot be considered part of the workforce and cannot be included in any staffing figures and employers will need to backfill these individuals. This additional cost is a significant burden for NHS organisations wishing to offer the Nursing Degree Apprenticeship.<sup>xviii</sup>
- 3.4. Providers across England are struggling financially and the funding from the apprenticeship levy does not meet the cost of providing an apprenticeship.<sup>xix</sup> The levy was designed to cover the cost of an apprentice undertaking off-the-job training for 20% of their contracted hours, yet the NMC requirements mean that nursing degree apprenticeships must undertake off-the-job training for 50% of their hours.<sup>xx</sup> This situation creates financial challenges for employers, as they are required both to pay apprentice salaries and to backfill salaries for the 50% of the time apprentices are off-the-job. Many current nursing apprentices were part of the existing workforce, but once they start an apprenticeship programme, they take on supernumerary status which generates an additional £35,000 or £40,000 of cost per student every year for four years.<sup>xxi</sup> The House of Commons Education Committee has acknowledged that many professions are exceptions to this model, but the requirement for nursing students to be supernumerary is 'highly unusual', and for nursing degree apprenticeships, it must be reflected in the UK Government's levy policy.<sup>xxii</sup>

#### **4. Continuing professional development to support retention and safe and effective care**

- 4.1. Formal and ongoing higher education during a nursing career enables registered nurses to develop their careers and expertise, become specialists in both acute and long-term conditions such as cancer, respiratory, cardiac, and a variety of others, as well as design, lead and deliver innovative care models to meet changing population needs. Career development is critical to keeping professionals supported within the workforce, essential for ongoing safe and effective practice, and for career progression; all of which contribute to retention.
- 4.2. However, investment by successive governments in nursing professional education has been insufficient or aligned with the ambitions of the health and care service in England and is yet to recover from the 2015 Spending Review which cut 60% of the Health Education England (HEE) budget for Continuing Professional Development (CPD) for nurses (from £205 million in 2015/16 to £83.49 million in 2017/18).<sup>xxiii</sup> In contrast, the 'future workforce' postgraduate medical and dental budget was increased by 2.7% in 2017/18.<sup>xxiv</sup> This is a significant and unfair disparity between the nursing and medical professions, despite the presence of need within nursing. .

- 4.3. The UK Government announced an increase of £150 million in the CPD budget for NHS-employed nursing, midwifery, and allied health staff in the 2019 spending round.<sup>x</sup> This represents only a £30million funding increase over the 2015/16 levels, despite years of staff growth, under-investment in professional development and inflation. This funding was not provided to all NHS-funded nursing staff, nor did it include staff in publicly funded social care and public health services. Furthermore, RCN intelligence indicates that this money has not consistently been invested in meaningful professional education opportunities. The UK Government must go further and develop a strategic approach to the levels of CPD required and fully fund it accordingly.
- 4.4. RCN members call for ring-fenced funding for CPD for all nursing staff, in all health and care settings and sectors, alongside pay progression and career development opportunities. Funding must be based on modelling of future service and population-based need, as well as the correctly identified skill mix and establishment required.

## 5. RCN Recommendations

- 5.1. The RCN continues to call for the UK Government to increase the supply of registered nurses through nursing higher education by increasing financial support and abolishing student-funded tuition fees, for all nursing students in England.
- 5.2. The UK Government must:
- 5.2.1. Fund tuition fees for all nursing, midwifery, and allied health care students
  - 5.2.2. Introduce universal, living maintenance grants that reflect actual student need
  - 5.2.3. Reimburse tuition fees or forgive current debt for all nursing, midwifery and allied health care students impacted by the removal of the bursary
  - 5.2.4. Commit sufficient and dedicated funding for CPD for all nursing staff, in all health and care settings, alongside pay progression and career development opportunities. Funding must be based on modelling of future service and population-based need, as well as the skills mix and time required

## About the Royal College of Nursing

The RCN is the voice of nursing across the UK and the largest professional union of nursing staff in the world.

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April 2022

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- <sup>i</sup> Department for Education (2022) [Lifelong Loan Entitlement consultation \(education.gov.uk\)](https://www.education.gov.uk)
- <sup>ii</sup> NHS Vacancy Statistics (2022) [NHS Vacancy Statistics \(and previous NHS Vacancies Survey\) - NHS Digital](https://www.nhs.uk)
- <sup>iii</sup> DHSC (2022) Policy paper 50,000 Nurses Programme: delivery update Published 7 March 2022 [50,000 Nurses Programme: delivery update - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- <sup>iv</sup> NMC [The NMC Register Mid-year update: 1 April to 30 September 2021](https://www.nmc.org.uk)
- <sup>v</sup> WHO (2020) [WHO State of the World Nursing Report \(2020\)](https://www.who.int)
- <sup>vi</sup> WHO (2020) [WHO State of the World Nursing Report \(2020\)](https://www.who.int)
- <sup>vii</sup> WHO (2010) WHO Global Code of Practice on the International Recruitment of Health Personnel [Global Code of Practice](https://www.who.int)
- <sup>viii</sup> [ICN \(2022\) Sustain and Retain in 2022 and Beyond- The global nursing workforce and the COVID-19 pandemic](https://www.who.int)
- <sup>ix</sup> [Registration data reports - The Nursing and Midwifery Council \(nmc.org.uk\)](https://www.nmc.org.uk)
- <sup>x</sup> HM Treasury (2015) Policy paper Spending Review and Autumn Statement 2015: documents <https://www.gov.uk/government/publications/spending-review-and-autumn-statement-2015-documents>
- <sup>xi</sup> NAO (2020) The Nursing Workforce <https://www.nao.org.uk/wp-content/uploads/2020/03/The-NHS-nursing-workforce.pdf>
- <sup>xii</sup> RCN analysis of RCN's bespoke UCAS End of Cycle data 2015-2020. Unpublished
- <sup>xiii</sup> UCAS (2022) Cycle applicant figures – 26 January Deadline. <https://www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-releases/applicant-releases-2022-cycle/2022-cycle-applicant-figures-26-january-deadline>
- <sup>xiv</sup> *ibid*
- <sup>xv</sup> RCN (2020) Beyond the Bursary: Workforce Supply [Beyond the Bursary: Workforce Supply| Royal College of Nursing \(rcn.org.uk\)](https://www.rcn.org.uk)
- <sup>xvi</sup> Health Committee, Second Report of Session 2017-19 (2018). *The Nursing Workforce*. <https://publications.parliament.uk/pa/cm201719/cmselect/cmhealth/353/35302.htm>
- <sup>xvii</sup> Royal College of Nursing (2019). *Nursing Apprenticeships*. <https://www.rcn.org.uk/-/media/royal-college-of-nursing/documents/policies-and-briefings/uk-wide/policies/2019/br-0319.pdf?la=en>
- <sup>xviii</sup> Education Committee, Eight Report of Session 2017-19 (2018). *Nursing degree apprenticeships: in poor health?* <https://publications.parliament.uk/pa/cm201719/cmselect/cmeduc/1017/1017.pdf>
- <sup>xix</sup> Royal College of Nursing (2019). *Nursing Apprenticeships*. <https://www.rcn.org.uk/-/media/royal-college-of-nursing/documents/policies-and-briefings/uk-wide/policies/2019/br-0319.pdf?la=en>
- <sup>xx</sup> NMC Running a nursing degree apprenticeship in England [apprenticeships in nursing and midwifery - The Nursing and Midwifery Council \(nmc.org.uk\)](https://www.nmc.org.uk) accessed on 5 May 2022
- <sup>xxi</sup> Health Committee, Second Report of Session 2017-19(2018). *Oral Evidence*. <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/education-committee/nursing-apprenticeships/oral/84628.html>
- <sup>xxii</sup> Education Committee, Eight Report of Session 2017-19 (2018). *Nursing degree apprenticeships: in poor health?* <https://publications.parliament.uk/pa/cm201719/cmselect/cmeduc/1017/1017.pdf>
- <sup>xxiii</sup> HM Treasury (2015) [Spending Review and Autumn Statement 2015: documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- <sup>xxiv</sup> Health Education England (2017) HEE proposed budgets for 2017/18 <https://www.hee.nhs.uk/sites/default/files/documents/HEE%20annual%20report%202017-18.pdf>