

Ms A Pritchard  
Chief Executive Officer  
NHS England  
Wellington House  
133-155 Waterloo Road  
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25 April 2023

Dear Ms Pritchard

### **Response to the NHSE/Health Education Merger April 2023**

With a membership of over 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.

### **Background to merger**

The Health and Social Care Act 2022 effected the merger of NHS England (NHSE) and NHS Improvement (NHSI) into a single employer NHS England. It also enabled plans to merge NHSE, Health Education England and NHS Digital into the new NHS England.

In 2022 NHSI merged into NHSE. In February 2023 NHSD merged into NHSE after a formal consultation with the workforce and employers. On 1<sup>st</sup> April 2023 HEE merged into NHS England after a 45-day consultation period.

Simultaneously, there are a number of organisational change processes taking place across NHSE to:

- a) Review National Programmes.
- b) Change the Workforce and Training Directorate.
- c) Change the Transformation Directorate;
- d) Move some functions out to Integrated Care Boards.
- e) Streamline and reduce the workforce in the new combined NHSE by up to 40%.

To carry out these changes and comply with current employment legislation, NHS England, Health Education England and NHS Digital set about constructing consultation machinery



with the recognised trade unions in all three employers and established the Tri-lateral Partnership Forum to consult and engage with trade unions, including the RCN.

From the outset the trade unions have warned that the speed of change and the large number of organisational changes and redundancies (approx. 5,200) was difficult to manage and unwelcome in the context of the current climate within the NHS.

The RCN and the other trade unions raised concerns about the lack of detail for the new organisation and structures, the lack of information initially for members regards to making a choice whether to apply for Voluntary redundancy (VR) or not.

The RCN and the other Trade Unions continue to be extremely concerned about the scale of job losses and negative impact that will have on members, services provided across the merged body - NHSE.

Trade Unions did not agree with the Voluntary Redundancy (VR) scheme that was launched in February 2023. Furthermore, the RCN understands that there is likely to be another offer of VR later this year, which again will have a destabilising effect on the workforce.

### **Impact on Nurse Education**

The RCN are very concerned about the loss of Health Education England and its focus on education, recruitment and retention within the current and future clinical workforce.

The RCN is concerned that the nursing and nurse education expertise and knowledge built up over 10 years in HEE with Nurse education, the largest clinical workforce, will be 'lost' and possibly minimised when that function moves into the Workforce and Training Directorate within NHSE. As stated there will be significant job losses and nursing staff won't be exempted from those losses.

Current expertise and leadership in student nurse programme commissioning and planning, during a time of a recognised workforce crisis will compromise future recruitment and retention. The RCN expresses concern over the loss of the Chief Nurse role and representation of the nursing profession at board level. The erosion of wider expertise will widen the gap between nursing and other health professionals when addressing the parity of the approach and funding opportunities.

The RCN expresses concern regarding the inequity of approaches to training and CPD budget allocation across England with a review of the approach required to ensure parity and consistency towards funding and agreed released CPD time. This will secure the development of current and future careers across health and social care. With the recent

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release of the HEE Education Workforce Strategy there is a renewed call from the RCN to engage with the Professional Body to address the concerns regarding nurse educators.

Core budgets that HEE was responsible for, including training health care professionals, widening participation, apprenticeships and nursing associates have not been set for this financial year. Personal Training Budgets launched in 2019 offering £1000 over three years for nurses and midwives closed in March 2023 with no clarity for the profession over whether they will be reinstated. This uncertainty is increasing pressures on the health and care workforce.

Workforce development funding must be reinstated at a sufficient level based on modelling on future service and population-based needs. The CPD allocation for 2022/23 represented a freezing of CPD funding and a missed opportunity to help retain experienced staff. Supporting nurses in their professional development is vital in retaining experienced staff, as well as providing specialist care and tackling health inequalities. There is lack of clarity about how this will be delivered, and by whom, in the Workforce and Training Directorate, where many of HEE functions will transfer.

The RCN is also concerned about the forthcoming organisational change process that will impact on the Nursing Directorate within NHSE, again reducing the voice of nursing within the new NHSE.

### **Nurse Leadership**

Given the loss of nurse leadership when HEE move into NHSE, and the forthcoming re-organisation of the Nursing Directorate within NHSE commencing in early April, the RCN would suggest that a pause in the organisational programme be allowed to take place, to allow those functions transferring in from HEE time to 'settle down' into NHSE.

Ensuring that there is strong nursing leadership in place across health and care structures and organisations is vital: registered nurse expertise is critical to ensuring decisions are made in the best interests of patients, and robust nursing leadership at board level, is vital for ensuring effective and appropriate oversight of quality and safety. The RCN is extremely concerned to learn that the Chief Nurse role which was within the HEE structure has been removed as part of the merger with NHSE. The loss of this role reduces the recognition of nursing as the majority workforce in the delivery of healthcare and provides a message of reduced value mirrored across the merger through loss of expertise.

Registered nurse expertise is critical to ensuring decisions are made in the best interests of patients and nurse leadership is vital to delivering the ambitions of the Health and Care Bill and the NHS Long Term Plan.

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## Impact on workforce planning, what will be the role and how will it be carried out

In England, there is currently no comprehensive health and care workforce strategy. In its absence, significant shortages have developed within the nursing profession, along with high levels of turnover and a dependence on expensive agency staff. This has led to unsafe staffing levels and unmet needs amongst the population.

Safe and effective staffing levels are critical to nursing staff feeling valued at work and being able to provide the best possible quality of safe and effective patient care. Longstanding and significant issues for safe staffing planning across England have not been resolved, and we are concerned that this merger will reduce the resource available to provide sufficient national leadership for workforce planning. We are also concerned that a reduction in nursing leadership provision will have negative implications for the consideration of nursing issues within wider workforce planning discussions.

There is a strong body of evidence demonstrating the necessity of good quality nursing workforce planning to meet the changing healthcare needs of the population and provide safe and effective patient care. The patient outcomes most impacted by registered nurse staffing numbers are mortality, care quality, missed care and 'adverse events' (such as medication errors or the onset of pressure ulcers) (Health Services and Delivery Research, 2018; International Journal of Environmental Research and Public Health, 2020).<sup>iii</sup>

Poor staffing levels are caused by insufficient numbers of nursing staff being recruited and retained, which in turn is due to a lack of strategic workforce planning. Nursing constitutes the largest workforce in health and care, and therefore a significant proportion of public funds. Given the impact that poor recruitment and retention can have within a safety critical profession, it is imperative that the merged NHS England delivers strategic workforce planning.

The RCN calls on the newly merged NHSE England to:

- ensure there is a fully costed and funded health and care workforce plan in place. This plan should include specific measures on supply, recruitment, retention, and remuneration of nursing staff.
- publish independently verifiable assessment of health and care nursing workforce requirements to meet the needs of the population and address health inequalities to underpin workforce strategy development and monitoring.

- take actions to grow the domestic supply of nurses and retain UK and internationally trained staff.

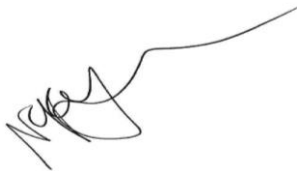
### Ongoing organisational change and impact on nursing staff within NHSE

The RCN has already made the point that the merger takes place against an unprecedented level of organisational change across NHSE/HEE and has real concerns for those nursing staff left in NHSE and their ability to carry out their work effectively. The RCN would like to know what activities and functions will no longer be carried out by NHSE and how those decisions have been made.

### Equality Diversity and Inclusion

Given the new race equality targets announced in February 2023 for the NHS to tackle the rising levels of racism in the workplace, it is unclear how the impact of redundancies and re-organisation will enable NHS England to carry out that work and hold the service to account for the unacceptable levels of racism across the NHS and drive improvement across the NHS in England.

Kind regards



Prof. Nicola Ranger  
Director of Nursing



Patricia Marquis  
Director RCN England

Copy to: Ruth May, Chief Nursing Officer  
Helen Bullers, Director of Human Resources and Organisational Development

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<sup>i</sup> [Health Services and Delivery Research: Nurse staffing levels, missed vital signs and mortality in hospitals: retrospective longitudinal observational study \(November 2018\)](#)

<sup>ii</sup> International Journal of Environmental Research and Public Health: The Association between Nursing Skill Mix and Mortality for Adult Medical and Surgical Patients: Protocol for a Systematic Review (2020)

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