

Response to the Government consultation on behalf of the Office for Students - *Securing student success: risk-based regulation for teaching excellence, social mobility and informed choice in higher education*

The Royal College of Nursing has a strong interest in ensuring the right number of nurses, and healthcare colleagues, are trained in the UK to meet the population's health demand. This requires strategic workforce planning, including the current data on the number of healthcare students.

We are therefore responding to **Chapter 5** of this consultation, entitled ***On the register. Provision of information the Office for Students (OfS) and designated bodies require to perform their functions*** and specifically to conditions for registration Condition J2:

“For the purposes of the designated data body’s duties under sections 64(1) and 65(1) of Higher Education Research Act (HERA), the provider must provide the designated data body with such information as the designated data body specifies at the time and in the manner and form specified by the designated data body”.

Consultation question 1. Do you agree or disagree with the general ongoing registration conditions proposed for each category of provider (see the Guidance for further detail)?

- 1.1 We agree with these, but urge that **a statutory requirement for providers to report the latest available data on healthcare student numbers to the designated data body is added.**
- 1.2 The 2016 reform by HM Treasury and Department of Health of health professional education funding introduced tuition fees for all undergraduate nursing, midwifery and allied health professions studentsⁱ. At the same time this removed all statutory workforce reporting by Health Education England (HEE) in the form of Higher Education Institutions (HEIs) reporting their healthcare student numbers.
- 1.3 There is currently no official monitoring of numbers of nursing and healthcare students. UCAS is providing application and acceptances data for B7 Nursing on an extraordinary basis only in 2017 and 2018. They are doing so only because of the reform, do not ordinarily provide subject-level data in cycle and it is unclear whether this data will be available in future. Higher Education Statistics Agency (HESA) data on student numbers is currently only available with an 18 months' time lag. This means that the most current student numbers are not publically available to assess and plan future workforce supply for health and care services. This must be urgently remedied.
- 1.4 As set out in this consultation, the future designated data body will work with other agencies to publish data and to compile and make available information on higher education to the OfS, UK Research and Innovation and the Department for Education (DfE) Secretary of State for the performance of their statutory functions.ⁱⁱ

- 1.5 A statutory requirement should be added to the above duty, so that the designated data body reports real-time student numbers of relevant healthcare subjects to the Department for Education, the Department of Health and to the Secretaries of State for each agency. This requirement would not impose an additional administrative burden on higher education providers if the data continues to be returned in line with the existing data standards developed by HESA.
- 1.6 Accurate data on the number of health professionals in education and training, such as nurses, midwives and allied health professionals, is a fundamental input measure for any workforce strategy. The Department of Health and HEE have just published the first single workforce strategy for health and care.ⁱⁱⁱ Failure to secure this data for the Department of Health will undermine this public initiative aimed at ensuring sufficiency of supply of health professionals for publicly funded services. There is clearly a strong public interest in securing this data in a timely manner to enable agile and responsive workforce planning by Secretaries of State, Departments and relevant statutory agencies.
- 1.7 Given the public interest in the data and its utility in the running of the National Health Service (NHS), it is likely that access is sought to this data in the future. This likelihood is significantly increased by the Department of Health's current consultation on the development of the first ever ten-year health workforce strategy.
- 1.8 The OfS and designated data body are required within the Higher Education and Research Act (HERA) to cooperate with other bodies collecting data and to have regard to reducing the data collection burden on providers. The OfS should therefore pre-empt future approaches and develop a reporting requirement for this data now. We strongly urge DfE to anticipate future need and design the new regulatory framework in a way that meets both health and higher education system requirements.
- 1.9 To develop this reporting requirement, the OfS should work with the designated data body, the Professional Standards Authority (which is already working to reduce regulatory burden), Health Education England and the Department of Health as well as sector representative bodies. It should also consider this requirement as part of the work on its data strategy in spring 2018.

This submission is supported and endorsed by the National Union of Students.



The Royal College of Nursing

With a membership of around 435,000 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.

ⁱ Department of Health, *Reforming healthcare education funding: creating a sustainable future workforce. Government Response to public consultation*, July 2016, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/539774/health-education-funding-response.pdf

ⁱⁱ Department of Education, *Designation of a body for English higher education information Government consultation in accordance with section 118 of the Higher Education and Research Act 2017*, https://consult.education.gov.uk/higher-education/designated-data-body-for-higher-education-in-engla/supporting_documents/Designation%20of%20a%20body%20for%20English%20higher%20education%20informationGovernment%20consultation.pdf

ⁱⁱⁱ Health Education England, *Facing the Facts, Shaping the Future – a health and care workforce strategy for England to 2027*, December 2017, <https://hee.nhs.uk/our-work/planning-commissioning/workforce-strategy>