RCN initial response to the Department of Health consultation: Changing how healthcare education is funded
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Background

On 7 April 2016 the Department of Health (England) published a consultation on plans to reform higher education funding for nursing, midwifery and allied health professional students in England. The consultation 'Changing how healthcare education is funded' runs for 12 weeks until 30 June. The consultation follows an announcement made in the Comprehensive Spending Review and Autumn Statement in November 2015 that from 2017, the NHS bursary for nursing, midwifery and allied health professional students in England would be replaced with student loans and tuition fees.

An RCN factual briefing on the consultation proposals is also available and should be read in conjunction with this document www.rcn.org.uk/professional-development/publications/pub-005622

The RCN will be submitting a detailed and evidence-based response to the Government’s consultation after undertaking the widest possible engagement with our members, including through a survey of members in England. More details will be posted on our website at www.rcn.org.uk/studentbursaries
The RCN is deeply concerned that the Government’s proposals are ‘high risk’. We believe these changes should be immediately halted until a suitable model of funding is evidenced and agreed upon. There is potential for the proposed changes to impact adversely on the future education and supply of nursing. The College believes that the Government’s impact assessment and equality assessment has not fully addressed all the potential impacts of the proposals. Some key risks are lacking in a detailed assessment and others are missing altogether.

The consultation document appears to assume that there is broad agreement for the proposed changes among the nursing profession. The document also makes an assumption that the changes will result in an increase to the graduate nursing workforce. Only a relatively narrow set of issues are subject to consideration and form the basis of the consultation questions. The RCN believes that there are significant risks associated with the current consultation proposals as a whole. These risks have the potential to detrimentally impact on patient care and the provision of comprehensive health services.

The RCN disagrees with the current proposals set out in the consultation. We believe these changes, as they currently stand, could deter prospective students from entering the nursing profession and risk worsening the nursing shortage in England. We are concerned that the prospect of starting a career with a large debt will deter mature students, many of whom have dependants, from joining the profession altogether. The change to a loans-based system will leave many nursing students with debts of up to £60,000 for a three-year degree.

The consultation highlights the need to maintain wide access to nursing, but there is limited evidence of any assessment of the risks of unintended discrimination, for example, in relation to age, gender, religion, BME and socio-economic groups. There is limited evaluation of the impact on mature students and women, especially those who become pregnant. The RCN is absolutely clear that the nursing profession should be accessible to a wide range of students and those who are entering nursing as a second career.

Although the consultation states that some students will have access for around 25% more funding than before, we will be engaging with members to explore the likely impact of the substantial increase in debt. We believe that the introduction of tuition fees will have a far greater impact financially on nursing students. There is a need to look behind the ‘headlines’ of the consultation proposals. Anything that makes people worse off or deters them from becoming nurses, would be a big loss to our society and could threaten patient care.
Working with the Government

The RCN is calling on the Government in England to create a model of student funding that encourages people to join the profession and which recognises the unique aspects of pre-registration nursing degree courses. Nursing degrees are substantially different to most other arts and science degrees, student nurses are not like other students. A nursing student will spend 50% of their time in clinical practice carrying out valuable work directly with patients and families.

Getting the detail right for a fair, effective and sustainable funding system for nursing education is absolutely critical. We stand ready to work closely with Government to identify alternative funding models based on real engagement with stakeholders and a thorough assessment of risks.

There is no link in the core consultation documents to other proposals being taken forward by the Government that will impact on routes into nursing careers, including the nursing associate proposals and the NHS apprenticeship proposals. We are not convinced that there has been sufficient assessment of all the risks involved and how these could impact on the current and future nursing workforce.

We are calling for a funding solution that continues to promote the value of nursing as a graduate and university degree educated profession.
RCN planned engagement

In the absence of a sufficient evidence base for this decision, the RCN will be engaging with our members to undertake a more comprehensive assessment of the potential impacts and risks of the proposed changes. We will also seek to identify alternative funding approaches that will deliver a sustainable nursing workforce over the long term.

There are three fundamental areas of risk that we believe have not been sufficiently addressed in the Government's consultation and where we will be asking our members for their views. These are set out below:

• **How sufficient placement capacity and quality can be secured in light of substantial recent changes to nursing education.**

The Government has not provided a breakdown of the extra funding that will be made available in the event of extra demand on placements. No consideration is given to the impact on placements of other education reforms such as nursing associates and new apprenticeship routes, which are also likely to increase the workload of mentors.

• **The impact of the changes on the supply of a sustainable nursing workforce over the long term.**

The Government has not adequately addressed the risks to future security of the NHS workforce. There is a risk that the proposals could deter potential nursing students from applying and result in shortages. There is also a risk that an ‘open market’ approach could result in uneven distribution of students across nursing specialisms or geographic locations. The Government has not fully considered that scrapping the bursary could result in links being severed between the student and their future loyalty to the NHS.

• **How the changes may impact on fair and equitable access to nursing education.**

The Government has not sufficiently assessed all the risks of unintended discrimination in relation to age, gender, BME and socio economic groups. The equality assessment does not provide a rigorous analysis based on the unique profile of the nursing student population as largely consisting of female students as well as the large number of mature students, many of whom have caring responsibilities.

The RCN will be releasing a survey to explore member views and to inform the RCN response to this consultation. The survey will be available at: [www.rcn.org.uk/studentbursaries](http://www.rcn.org.uk/studentbursaries)

Please keep a look out for further information on the RCN website or contact the RCN Policy and International Department at [policycontacts@rcn.org.uk](mailto:policycontacts@rcn.org.uk)