

RCN response to the Institute for Apprenticeships and Technical Education consultation on changes to the funding recommendation – May 2020

The RCN supports apprenticeships as a route to increase the much-needed supply of Registered Nurses and Nursing Associates in England. There are currently at least 40,000 nursing vacancies in health and care in England.¹ The Government has committed to 50,000 more registered nurses in the NHS in England by the end of this Parliament and apprenticeships were also identified as a priority in both the *NHS Long Term Plan* and the *Interim People Plan*.

It is therefore essential that all routes into nursing are designed to encourage uptake. There is strong demand for nursing apprenticeships that goes beyond the number of apprenticeships currently available. One key to increasing this number is ensuring nursing apprenticeships are financially viable for employers to offer. Nursing degree apprenticeships are not currently attractive for employers, with the costs far exceeding the amount of money provided to the employer from the apprenticeship levy, hampering their uptake as employers have to subsidise them from service operating costs.²

There is currently a lack of transparency in how the funding bands are set. They are designed without public consultation and it is not always clear what criteria have been used to determine the funding level. Therefore, we broadly support the proposal to make the process for developing funding bands publicly available. We hope that this added transparency will ensure increased accountability that will lead to the highest proportion of apprenticeship funding being spent on teaching, learning and assessment in support of apprentices, rather than on unnecessary management and overhead costs.

However, we believe that the proposed methodologies for determining the level of funding for each apprenticeship standard, through a combination of generic teaching and consumables costs, could lead to a lower level of funding for nursing apprenticeships than is currently the case. This is because they fail to consider the high cost nature of nursing education. By using generic cost variables, they are unlikely to reflect the cost structure of the intensive and highly regulated apprenticeship standards, such as those used for nursing.

Nursing apprenticeships are regulated by the Nursing and Midwifery Council and therefore must conform to regulatory standards, including the requirement for supernumerary status, that other apprenticeships do not.³ We strongly support the supernumerary status for nursing apprenticeships but recognise that this makes the cost of nursing apprenticeships higher than other apprenticeships as it requires, among other things, employers to pay staff to 'backfill' an apprentice's role while the apprentice is undertaking job training at a higher education institute.⁴

¹ NHS Digital –NHS Quarterly Vacancy Statistics – February 2020 available here: <https://digital.nhs.uk/data-and-information/publications/statistical/nhs-vacancies-survey>

² The total costs to employers was outlined in detail in the NHS Employers submission to the Education Select Committee inquiry nursing degree apprenticeships in June 2018: <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/education-committee/nursing-apprenticeships/written/85717.pdf>

³ Supernumerary means that students cannot be counted as part of the workforce when they are learning on placement in a clinical setting. The introduction of supernumerary status was designed to give student nurses the opportunity to realise their own learning needs and also understand their professional responsibilities

⁴ For further information on why supernumerary status is essential to ensuring student and patient safety, see the RCN's position paper on supernumerary status in the UK here: <https://www.rcn.org.uk/about-us/policy-briefings/br-0519>

In addition, some of the assumptions made about the total number of teaching hours required for apprenticeships outlined in the consultation do not account for the intensive teaching, learning and assessment-time necessary for nursing. This is likely to result in the total funding for nursing apprenticeship standards once again being too low to incentivise a large number of employers.

We believe that there needs to be a significant increase in the level of funding for nursing apprenticeships. Anecdotal evidence from our members is that there is a strong employer demand to increase apprenticeships if they were better funded. To achieve this aim, this funding should not be set using an arbitrary or generic mechanism as outlined in the consultation document. Instead, we strongly recommend that the Institute work to understand the full costs of providing a nursing apprenticeship in consultation with employers and universities and set the funding band accordingly.

Finally, it is not clear from the consultation documentation whether or not the Institute has developed these proposals with the Government's 50,000 nurses commitment in mind. We would strongly encourage the Institute to consult with relevant Government bodies, regulators and arms' length bodies in the health sector to ensure that this has been properly considered.

It is essential that this consultation is seen within the context of the current COVID-19 emergency. We recognise that the Institute has a broad and non-health sector specific role. While we do not see any COVID specific issues with what is proposed here, we strongly encourage the Institute to work with other relevant government bodies, arms' length bodies and regulators to ensure the minimal possible disruption to regulation and future apprenticeship supply caused by the current COVID emergency.

About the RCN:

The Royal College of Nursing is the largest trade union and professional body representing 450,000 nursing staff across the UK.

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