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Consultation Document

Student Support Arrangements

Health Related Education and Training Programmes in Wales

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Action required: Responses by 1 August 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview This consultation seeks views on future student support arrangements for health related education and training programmes in Wales.

How to respond The closing date for responses is 1st August 2018

You can respond by:

- Using the online form
- Downloading a copy of the response form and returning it either by email or post to the details below.

Further information and related documents **Large print, Braille and alternative language versions of this document are available on request.**

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Data protection Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank

them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

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Foreword by Vaughan Gething, Cabinet Secretary for Health and Social Services

As a government our aim is to improve health and well-being in Wales, for individuals, families and communities, helping us to act on our ambition of prosperity for all, taking significant steps to shift our approach from treatment to prevention. This approach requires us all to think differently about how our services operate, the models of care used and the nature of the underpinning education and training programmes required to support the Welsh health system. We need to maintain, and where appropriate, increase the number of individuals pursuing education and training opportunities to enable them to contribute to the health system in Wales. It is important to balance the level of support provided by Welsh tax payers with the contribution individuals make post qualification to service provision in Wales.

I am clear the sustainability of the NHS relies heavily upon the ability of the workforce to respond to the challenges it faces; from an ageing population to technological advances and a growing demand for health and social care. The flexibility requires a variety of high quality training and development opportunities which are constantly updated to ensure each member of the workforce has the skills, knowledge and experience to do their job to the best of their ability. Despite the impact of a decade of cuts to the Welsh budget the Welsh Government has consistently invested in the education and training of individuals working in and wanting to work within the NHS; and as a government we will continue to do so. We have demonstrated this year after year with the number of training places offered in Wales at its highest since devolution.

It is important to ensure the investment we make, to support individuals is targeted in a way that assists by removing as many barriers to study as possible. To do this, it is important the student support arrangements in place address the issue which students see as barriers to studying. To do this we need to listen to what students and employers are telling us about the nature of the support required.

As highlighted in Prosperity for All: the national strategy – The NHS in Wales is employing more doctors and nurses, treating more people, and people are living longer. This is in part due to the investment made in supporting individuals to be able to take the first step on their career ladder. Across a wide range of staff groups within the health and care system in Wales.

It is important that we regularly review the funding arrangements in light of changing circumstances to ensure the best value for money is achieved for taxpayers in Wales.

I welcome your views in response to the issues raised in this document.

Policy Background

To maintain high quality and accessible services the NHS must attract individuals from all sectors of the community to train as health professionals.

This means the systems in place to provide support to individuals during their training should promote and encourage accessibility to all, regardless of background.

There are more than 300 careers in the NHS which make up a comprehensive health care system which every day saves lives.

The Welsh Government is committed to ensuring all individuals across Wales are able to both aspire to and achieve a career in the health care system and contribute to a service which supports the people of Wales; often at a time when they are most vulnerable.

We are committed to providing services as close to patients' homes as possible. In order to do this we need to ensure training programmes support this approach.

The support for health care related students has traditionally been provided through the NHS Wales Bursary arrangement, which has provided opportunities for a wide range of individuals to be part of the NHS and wider health and social care network. These arrangements have been available to individuals who choose to undertake their education and training in Wales, across a wide range of eligible programmes of study. The NHS Wales Bursary has not traditionally supported individuals from Wales who choose to study outside Wales. Students in receipt of NHS bursaries also have access to elements of the standard student support package to supplement their living costs.

In contrast individuals studying non health related programmes receive a different package of support and operate within a different set of arrangements which is based upon funding following the student i.e. students from Wales choosing to study outside Wales would receive a package of support through the Student Finance Wales arrangements.

The NHS Bursary Scheme is an administrative scheme, the detail of which is able to be changed quickly, whereas the student support arrangements are underpinned by regulations made under the Teaching and Higher Education Act, with an 18 month lead in period for changes to those regulations.

As part of this consultation it is appropriate to consider whether these two schemes should continue to operate independently or whether there are opportunities to harmonise common elements across the two approaches.

Changing landscape

A decision had already been made to review the wider student support arrangements for non bursary funded students. From April 2014 to July 2016, Professor Sir Ian Diamond led a two year review of future funding mechanisms for

higher education and student finance in Wales which consulted extensively on the issues relating to student support and higher education funding.

Within a similar timeframe the UK Government announced its intention to replace grant based bursary support for those participating in nursing, midwifery and AHP education in England in favour of loans based approach. This aligned the support available to students in England, with the exception of medical and dental students, who were not impacted by the announced change.

From 1 August 2017 in England, new nursing, midwifery and most allied health students no longer receive NHS bursaries. Instead, they have access to the same student loans support as other students. This applies to new students on pre-registration courses (those which lead to registration with one of the health professional regulators).

English students who already have a degree and are planning to undertake a nursing, midwifery or allied health profession subject as a second degree will now also have access to student loans through Student Finance England. Those wishing to study a second degree in a non-health general capacity remain unable to access student loans a second time around.

This decision taken by the UK Government produced a series of implications across the UK, not least to the reciprocal funding arrangements, which meant that students from Wales studying health related programmes funded by England were no longer eligible to receive funding.

Interim arrangements for students in Wales have been announced for 2017/18 and 2018/19 pending a review/consultation on the arrangements for providing financial support for healthcare students in the longer term.

Key themes from the Diamond Review

The changes to the Bursary arrangements in England and the outcome of the Diamond Review have provided a context for the review of the NHS Wales Bursary arrangements. The final report from the Diamond Review, which was published on 27th September 2016 identified some key recommendations that would shape the future funding of Welsh students. The recommendations on student support, which were largely accepted by the Welsh Government, have shaped the main student support package that will be available to Welsh-domiciled students from 2018/19 onwards.

On 11 July, the Cabinet Secretary for Education confirmed that there will be a shift in the balance of support from tuition fees to living costs. This will take the form of a more comprehensive package of support for living costs, linked to the National Living Wage, for eligible Welsh-domiciled students. All eligible students will have access to the same total amount of support, made up of a mix of grant and loan. The highest level of grant will be directed towards students from the lowest income backgrounds, and all full-time students will receive a minimum grant of £1,000. The new

arrangements will apply to new students from the 2018/19 academic year onwards. The changes were outlined in a [final report](#), which was published in July.

Current Position in Wales

The Cabinet Secretary for Health, Well-being and Sport announced on 9 December, 2016 that the NHS Bursary would be maintained in Wales. It was confirmed that for those individuals who elect to study an eligible health related programme in Wales commencing in September 2017, the current NHS Bursary would be available.

This is based upon individuals committing in advance to take up the opportunity to work in Wales post qualification for a period of two years. Individuals who did not feel they could commit to this two year service provision are not eligible to receive the benefits of the NHS Wales Bursary Scheme; however Welsh domiciled students in this situation have access to the standard student support package available from Student Finance Wales. [Students from other domiciles may similarly have access to support from their local student finance office].

On 9 May the Cabinet Secretary for Health, Well-being and Sport committed to the retention of the current NHS Wales Bursary Scheme for the 2018/19 academic year.

The extension was intended to enable more detailed work to be taken forward to further consider the longer term arrangements in light of the outcomes of the Diamond Review, including a full consultation process, to ensure the support arrangements for health care students is fit for purpose and sustainable in the future.

The detail of the [current NHS Wales Scheme](#) can be accessed here:

<http://www.nwssp.wales.nhs.uk/sitesplus/documents/1178/1693500%20-%20T%26Cs%20incorporating%20comments%20of%20A%20Sims%2028.11.17.pdf>

1. Should the Welsh Government continue to provide support to those studying health care related programmes?

Place of Study

At present the NHS Bursary arrangements are available to individuals who elect to study on approved programmes within Wales, it does not generally support individuals from Wales who choose to study outside Wales.

With the exception of a small number of education and training programmes which are not delivered within Wales, the Welsh Government has received representations from individuals who have been unable to secure a place on a health related education and training post within Wales. There have been representations from individuals about the current policy to support those who study in Wales rather than supporting individuals from Wales regardless of where they choose to study, which is the approach taken for non health related programmes.

The NHS Bursary has always been provided on the basis of the location of training rather than the domicile of the individuals undertaking training. There has been no policy change in this respect.

In previous years support would be provided through reciprocal arrangements across the UK, however following the decision of the UK Government to withdraw the Bursary arrangements in England, and therefore the reciprocal arrangements, it was necessary to agree the funding arrangements for individuals from Wales electing to study elsewhere. At that point a decision was made to maintain the policy approach that eligibility for the Bursary in Wales would continue to be offered for individuals choosing to study in Wales. Welsh domiciled students electing to study elsewhere were allowed access to the wider student finance arrangements.

- 2. Do you agree any Bursary arrangements established for the future should continue to be based on supporting individuals who choose to study in Wales regardless of their domicile?**

Clinical Placements

The programmes supported currently by the NHS Wales Bursary include clinical placements which are a mandatory part of the studies. These placements extend the academic year for healthcare students; they include unsocial hours and they reduce the time available for students to undertake part time work to supplement their living costs.

Placements are a fundamental way of ensuring students are exposed to the environments they will be working in post qualification, are able to learn the skills required by the role and experience interaction with patients, a range of professionals and the wider community.

The format of healthcare courses has the potential to increase costs associated with childcare, travel and other general living expenses. The current arrangements incorporate an element of additional funding to recognise the impact of placements, and this will also need to be addressed in any future arrangements.

- 3. Do you agree the format of healthcare courses should be recognised and addressed through any future arrangements?**

- 4. Do you have any views about ways in which this can be addressed?**

Ensuring quality placements

The quality of placements within health related education and training programmes is fundamental to ensuring individuals choosing to pursue a career in the health system in Wales are trained to the required standard. To enable quality to be maintained it is important the offer of placements does not exceed the capacity of the system to deliver and lead to a dilution of the integrity of the placement arrangements. It is also important the NHS is not overwhelmed by the need to support students at the risk of

a deterioration of service provision. There is also a need to ensure individuals supported to undertake training in Wales have a realistic expectation that upon completion of their programmes of study there will be opportunities for employment as a result.

A situation where the number of training places in a specific profession significantly exceeds the opportunities of employment, at the expense of training individuals in other professions, would not be a favourable position. Therefore a balance is required.

At present the level of placements is managed through the annual commissioning arrangements. While there is a need to expand the number of placements across the range of health and social care settings, this does need to be done in a managed way.

The alternative would be to allow an unrestricted number of places to be made available, with no ability to manage the financial and other implications for Wales. We are not persuaded this would be the best way of maximising investment.

5. Do you agree placement capacity should continue to be managed through a commissioning process, which in the future would be led by Health Education and Improvement Wales?

Subjects covered by NHS Bursary arrangements

The current NHS Wales Bursary arrangements support a limited number of health related programmes, which are set out below. In order to maximise the investment available to support the education and training of health professionals it has been necessary to identify the programmes which are eligible for Bursary support.

- Chiropodist (including podiatrist),
- dietician
- occupational therapist
- physiotherapist
- radiographer
- healthcare scientist
- paramedic
- speech & language therapist
- physician associate,
- operating department practitioner
- dental hygienist or dental therapist
- nurse or midwife
- doctor or dentist (eligible for bursary in the latter stages of training)

The NHS in many ways is a victim of its own success, with more demands being placed upon it each year. There will always be a need for individuals to undertake education and training to enable them to fulfil professional roles within the NHS and wider health and care system in Wales. The Welsh Government has continued to invest in this, however there will always be choices to be made about exactly where that investment is targeted.

It is important that any methodology which informs decisions about investment is aimed at maximising the resource available and reflects changes to workforce requirements resulting from changes in service delivery models, demography and technological advances.

From October 2018 Health Education and Improvement Wales will lead on strategic workforce planning for Wales and will be responsible for considering how and when investment in health related education and training programmes should be made.

It will be important for this new organisation to operate with a high degree of transparency to enable it to achieve credibility across the NHS Wales family and wider education sector.

Set out below are a number of approaches that could be taken to inform investment decisions. We welcome your views on each option set out below and any additional options you would like to recommend.

- Maintaining the current list of programmes.
 - Refresh the list of eligible programmes each year on the basis of identified priorities within the health system.
 - Agree a core list as standard with the potential for additional priority programmes to be added as necessary.
 - Restrict to those programmes which lead to registration and therefore without the qualification individuals are not able to practice in their chosen profession.
- 6. Should the NHS Bursary continue in the future what methodology should be used to determine which education and training programmes should be supported through a revised health student support arrangements?**
- 7. Are there other approaches which you consider could be applied, if so, please specify?**

Post qualification employment period

In 2017 the NHS Wales Bursary eligibility criteria was changed with individuals wishing to study in Wales asked to provide a commitment to work in Wales for up to two years following completion of their chosen health related programme.

These arrangements seek to ensure individuals benefitting from the support provided under the Bursary provide a level of investment in the services in Wales once fully qualified.

The new arrangements do not mean individuals are not able to study in Wales, but it does mean these individuals will access funding through the standard student support arrangements rather than the NHS Bursary enhanced arrangements.

- 8. Do you agree that any package of support provided to healthcare students should continue to require individuals to commit to a proportionate period of post-qualification employment in Wales?**

Currently, the post qualification employment period implies that employment in Wales must be in the profession that the education course has been undertaken. The employment can be within a range of settings including any NHS Health Board or Trust, primary care contractor, working for a local authority and charitable health care providers. It has been recognised that there are considerable difficulties in recruiting registered nurses into the care home settings. Therefore a decision has been made to include the independent care homes to qualify towards this employment criteria.

9. Do you agree that the post qualification criteria should be extended to include other employment settings?

10. If so, please specify these settings? (It would also help if you could provide reasons for each new setting suggested)

Funding arrangements for additional education and training programmes

The current NHS Bursary arrangements make provision for individuals to receive funding to undertake a second programme of education subject to eligibility rules. Given the financial difficulties facing the Welsh Government this could result in places being taken by individuals who have already received financial support while other individuals are not able to secure a first place on a health related programme.

11. Do you think individuals who have received support for an initial programme should be able to receive support through a Bursary arrangement to undertake additional education and training programmes? Yes / No

12. If yes do you think second and subsequent programmes should only be supported where the health system in Wales is experiencing difficulties with workforce capacity in specific areas?

Second degree issue for those in receipt of student finance support

Generally, students who hold a first degree are not eligible for student finance to study a second qualification at an equivalent level. Some exceptions are made for medical and dental veterinary surgeon and architecture courses. In addition, we consulted on the possibility of extending support for students on a range of courses earlier in 2016 (<https://beta.gov.wales/support-postgraduate-study-and-part-time-engineering-technology-or-computer-science-degrees>)

Following the responses received, from 2017/18 a package of part-time support will be offered by the Welsh Government to eligible students pursuing part-time Honours degree level courses in several subjects, including subjects allied to medicine. The list of subjects will remain under review.

NHS England Bursaries previously supported any first degree holders wishing to study a healthcare programme in England irrespective of whether or not the student already held an equivalent qualification. However, when the changes which removed bursary support in England were introduced the UK government introduced a new exception which enabled English domiciled students when pursuing healthcare courses as a second degree to receive support.

This exception is not currently available to full-time Welsh domiciled students studying healthcare courses as a second degree in England or if they study in Wales but opt out of receiving an NHS bursary. Students opting into the NHS bursary, and students pursuing part-time healthcare courses, will be eligible for support irrespective of whether or not they already hold an equivalent level qualification.

13. Should an exception be made to allow first degree holders wishing to study a second degree on a healthcare programme in England access to student support, whilst non healthcare students are not eligible for additional support?

14. Should the support provided for second and subsequent support packages for health related programmes be conditional upon individuals committing to work in Wales post qualification?

Equality Impact

The Equality Act 2010 replaced previous anti-discrimination law, consolidating it into a single Act. The Act covers discrimination because of age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These categories are known in the Act as 'protected characteristics'.

Section 77 of the Government of Wales Act 2006 places a duty on the public sector (also known as the public sector equality duty and as the 'general duty'), when carrying out its work, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation.
- Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not.
- Foster good relations between those who share a relevant protected characteristic and those who do not.

15. Do you consider there are issues which relate to equality and diversity which should be taken into account in developing future policy in this area? Yes / No

16. If you answered yes, please highlight the issues you feel should be taken into account.

Medical and Dental Financial Support

Currently individuals studying an undergraduate medical or dental course are eligible for funding from the NHS from the fifth year of study, or from the second year of their course if enrolled on a graduate entry programme. For the remainder of their programmes they are supported through the student finance arrangements.

In considering the arrangements for the future funding of health related programmes, views are sought on whether any revised set of arrangements for health related education and training programmes should also be applied to the full duration of medical and dental undergraduate level education programmes.

17. Should support for under graduate medical and dental programmes be aligned with those for other health related programmes in the future?

Options

A number of approaches to supporting health care students have been identified below.

18. Which of the proposed options do you think is the most appropriate for the long-term sustainability of the NHS workforce in Wales?

1. Healthcare students receive the standard student support package, through Student Finance Wales, in the same way as other students. This would not be subject to an agreement regarding post-qualification employment.
2. Healthcare students receive the standard maintenance support package through Student Finance Wales. An NHS Bursary would cover the funding of full tuition fees up to a maximum and an additional funding element for additional costs for clinical placements. This would not be subject to an agreement regarding post-qualification employment.
3. Healthcare students receive the standard maintenance support package through Student Finance Wales. An NHS Bursary would cover the funding of full tuition fees up to a maximum and an additional funding element for additional costs for clinical placements – subject to agreeing a post-qualification employment period.
4. Healthcare students receive the standard maintenance support package and partial funding of tuition fees (e.g. 50%) through Student Finance Wales. An NHS Bursary would cover the remainder of the tuition fee and an additional funding element for additional costs for clinical placements – subject to agreeing a post-qualification employment period.
5. Healthcare students receive the standard fee support package through Student Finance Wales. An NHS Bursary would cover living costs and an additional funding element for additional costs for clinical placements –

subject to agreeing a post-qualification employment period.

6. Healthcare students continue to receive the current NHS Bursary arrangements – subject to agreeing a post-qualification employment period.

19. Are there unidentified options that would be more appropriate:

- i) to support healthcare students during their studies? and/or
 - ii) to encourage students to pursue healthcare courses in Wales?
 - iii) for the long-term sustainability of the NHS workforce in Wales?
- Please specify

20. What are your thoughts on the support for healthcare students? Should there be a focus on support for tuition fees or living costs?