The Education (Student Fees, Awards and Support) (Amendment) Regulations 2017 amend the Education (Student Support) Regulations 2011 to allow eligible healthcare students to access the standard student support system, once bursaries have been withdrawn by the Department of Health. These Regulations do not themselves abolish bursaries.

**RCN points:**

- *We have consistently warned against the negative impact of student funding reforms in England and there is potential to compromise the supply of the future nursing workforce.*

  *As a result of these reforms, the number of applicants to nursing degrees is down by 23% since last year, with the actual number of training places still unknown.*

This year, the January UCAS data on applications and expected direct applications (around 10%) for nursing, indicate that there are likely to be nearly 40,000 applicants (from the UK, EU and rest of the world) for around 20,000 places in English universities. At a ratio of nearly 2:1 applicants to places, this shows that there is a strong market for students who want to study high-quality nursing degree programmes at English universities, which, for the vast majority of students, will lead to a nursing career in the NHS.

At a national level, these figures will allow the NHS in England to fill the approximate 20,000 student nursing training places, assuming that students meet the entry requirements of their offer from their course provider. The reforms also remove the current artificial ‘cap’ on

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1 The UCAS data shows the applicant pool from England, Northern Ireland, Scotland, Wales, the EU and rest of World total 37,380 applicant numbers for English places. Applications are ongoing and universities receive direct applications of around 10 per cent of totals - figure rounded to 40,000 as an estimate.
nursing, midwifery and allied health profession training places which will allow Higher Education Institutions to recruit more students than they are currently able to do.

We are working with the university sector on their ongoing recruitment of students for 2017/18 courses to see how we can most effectively attract older students into nursing degrees. We have already agreed that students who have been through the university system once can access loans for a second healthcare degree. We are also offering additional childcare and hardship funding as well as placement travel and dual accommodation expenses. This funding will be non-repayable and is in addition to the standard student support package.

- The consultation on the change from the NHS bursary to fees and loans for nursing and allied health professional students was inadequate and a second response on much of the detail has not yet been published, creating considerable uncertainty.

The full length public consultation launched on 7 April 2016 set out how the proposed reforms on funding and financial support for nursing, midwifery and allied health professionals could be successfully implemented. It closed on 30 June and in total 1,743 responses were received from both individuals and organisations. A response to the consultation was published in July 2016 and this provided information to students and higher education institutions about amended Government proposals for replacing bursaries. The proposals included a number of changes, building on consultation responses, to improve support for students whilst studying and when attending the mandatory clinical placement element of their courses.

A preliminary equality assessment and an impact assessment were published alongside the consultation on 7 April, with further assessments published following the close of the consultation.
The Department of Health (DH) and the Department for Education (DfE) continue to work with delivery, partner organisations and providers on successful implementation of the reforms, including on arrangements for postgraduate students, and the future clinical placement commissioning system. A further Government response on the postgraduate student offer and the system architecture will be published later this year.

- The policy is being implemented on the basis of an extremely limited equality analysis and fails to consider the potential impact on the diversity of applicants to nursing, for example by age and socio demographic groups. No consideration has been made of the unique profile of nursing students as demographically very different from the rest of the student population in relation to age, gender and previous education.

The Equality Analysis was published alongside the public consultation document on the 7 April 2016, and a further version was published alongside the first government response to the consultation in July 2016. It analysed the potential effects on equalities of the replacement of NHS bursaries by student loans for all the protected characteristics of the Public Sector Equality Duty (Section 149 of the Equality Act 2010). The Secretary of State’s Public Sector Equality Duty is on-going and will continue to be met under the reformed system.

- The reforms represent a shift in the ability to plan for the future nursing workforce, and are being implemented at a time of sweeping changes to nurse education and training in England. We believe the Government has failed to adequately evaluate the impact of this policy. It is an untested gamble, and we call on the Committee to refer this Statutory Instrument back to the House for additional scrutiny.
NHS workforce supply is a key priority for this Government. The Government will retain its current statutory responsibility for ensuring that there is an effective system for the planning and delivery of education and training for the current and future NHS workforce, so that NHS workforce planning requirements are successfully met. It will be for Health Education England (HEE) to continue to work with NHS Trusts to plan for future workforce needs and ensure adequate numbers of quality placements are secured. HEE will also ensure their work with the higher education sector on the quality of nursing, midwifery and allied health profession education continues as part of these reforms.

The reforms present an opportunity to expand the market for nursing, midwifery and allied health profession education and open up opportunities to train more students over the course of this parliament, which is expected to have wider benefits for longer-term NHS workforce supply needs.

The Care Act 2014\(^2\) sets out HEE’s remit and range of roles and responsibilities in detail, including HEE’s duty to ensure that our future workforce is available in the right numbers and has the necessary skills and training to meet patients’ needs and deliver high quality care.

- These reforms are high risk and further clarity is needed around how the Government intends to mitigate the risks to overall student numbers, equality and diversity and workforce planning. Thorough evaluation, monitoring and impact assessment is required before these reforms are implemented.

These reforms will enable access to nursing, midwifery and the allied health professions for more students. The Government has taken on board the consultation responses and amended

its proposals to improve support for students whilst studying and when attending the mandatory clinical placement element of their courses.

The Government is committed to monitoring and evaluating the effects of the reforms on student nurses, midwives and allied health professionals.

The Government will assess progress made against anticipated policy outcomes whilst putting in place a range of mechanisms to help us be aware of any emerging risks. Through this work, we will use local and national intelligence gained from universities and health sector bodies to target tailored support where it may be needed.

27 February 2017