Written evidence submitted by NHS Employers

INTRODUCTION

1. NHS Employers is a national organisation which acts on behalf of NHS trusts in England. We represent workforce leads across the NHS in national negotiations and policy development, and provide advice, guidance and good practice on workforce issues, including the education and training of the workforce and apprenticeships policy.

2. As an organisation, we maintain sustained and regular engagement with employers across the NHS in England, and therefore speak authoritatively on behalf of employers in this response to the Public Accounts Committee’s progress review inquiry into the apprenticeships programme.

3. In this response we set out NHS employer views and supporting evidence on:

   a) The challenges the NHS faces in the supply of qualified and registered staff
   b) The need for greater flexibility in the use of the apprenticeship levy for the health service in order to use the apprenticeship levy to manage its supply challenges
   c) The need for any future policy changes to take into consideration the potential impact on the NHS’ supply and financial challenges.

THE NHS SUPPLY CHALLENGE

4. As set out by this committee in a recent report on NHS financial sustainability, the NHS is facing unprecedented supply challenges, in particular in the nursing and midwifery professions. Across NHS trusts there is a shortage of more than 100,000 staff and based on current trends, the gap between demand and supply could reach 250,000 by 2030.

5. To help address these shortages, employers are exploring and investing in all available options to support increased supply, including the scale up of nursing associate and nurse degree apprenticeships. These apprenticeships provide opportunities to build nursing supply through a ‘grow your own’ approach, which also supports social mobility and widening participation into degree-level professions.

6. Despite the motivation to explore all available avenues to build nursing supply, the use of nursing degree apprenticeships is a cost-intensive approach, requiring £150k investment from the trust for each apprentice. This high cost is due to the large

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1 NHS Employers
2 House of Commons Committee of Public Accounts, ‘NHS financial sustainability: progress review’
3 The King’s Fund ‘The health care workforce in England: make or break?’
4 NHS Employers, ‘Your future nurses’ infographic
5 Health Education England ‘Trainee Nursing Associate numbers continue to grow as thousands more train to become Nursing Associates’
6 NHS Employers, ‘Strengthening your nursing supply’, Barking, Havering and Redbridge case study, May 2018
7 House of Commons Education Committee, ‘Nursing degree apprenticeships: in poor health?: Government response to the Committee’s Eighth Report of Session 2017-19
8 Education Select Committee nursing apprenticeships inquiry, NHS Employers’ written evidence
proportion of supernumerary or ‘off the job’ training time that is required as part of their training, as legislated by the NMC. This significant investment required for each nursing apprenticeship is limiting the service’s ability to make full use of these apprenticeships.

7. The recent report from the National Audit Office shows a predicted deficit in the levy fund over the next three years. However, despite this wider, cross-sector position the NHS is expected to significantly underspend on its levy this year, as the service is unable to make the significant investment required to utilise the levy to build supply in nursing and other shortage professions.

FLEXIBILITY REQUIRED

8. It is for the reasons set out above that we have continued to request the following flexibilities for the NHS in the way the apprenticeship levy is used:

a) The apprenticeship levy should be available to fund appropriate staffing cover in clinical areas for apprenticeships with an off the job requirement of more than 20 per cent

b) The apprenticeship levy should be made available for use to build the infrastructure within organisations, to facilitate greater scale up of apprenticeships

c) The timescale for which apprenticeships funds are available to employers should be extended from 24 months to 36 months to account for the time taken to scale up the range and number of apprenticeships available since the introduction of the levy in April 2017.

9. The implementation of these three flexibilities would enable the NHS to make fuller use of the apprenticeship routes into nursing and support the service to further address the supply challenges it faces without risk of financial destabilisation.

SUPPORTIVE APPRENTICESHIPS POLICY DEVELOPMENT

10. As the Government considers the implications of the predictions set out in the National Audit Office report on the apprenticeships programme, we are very concerned about the introduction of any policy move to reduce the NHS’ access to apprenticeships, limit higher level apprenticeships or any change which increased the financial burden on the NHS. Each of these policy directions would further hinder the NHS’ potential to maximise supply, improve staff experience, and make best use of the apprenticeships levy.

11. Any changes to apprenticeship levy policy to address the expected shortfall in funding should be explored with full engagement of the NHS, and with consideration to the impact any policy changes would have on the service’s ability to manage the significant supply crisis and existing challenging financial landscape within the NHS.

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9 Nursing and Midwifery Council, nursing education and training standards
10 National Audit Office, The apprenticeships programme
11 NHS Long Term Plan, chapter four
12 NHS Improvement, ‘Performance of the NHS provider sector for the quarter ended 31 December 201’
CONCLUSION

12. As set out in this response, the NHS has demonstrated motivation and enthusiasm for the apprenticeship agenda, both before\(^\text{13}\) and since the introduction of the apprenticeship levy. Employers in the NHS welcome the use of nursing apprenticeships to tackle supply challenges but are inhibited by the scale of the financial investment required to expand this training route.

13. We recommend that national action and policy change is required to enable the NHS to increase its use of existing nursing apprenticeships, in the form of use of the levy for supervision and placement infrastructure, use of the levy to fund appropriate staffing cover in clinical areas for apprenticeships with legislated ‘off the job’ training of more than 20 per cent, and an extension to the timescale within which access to the levy funds are available.

14. We welcome the opportunity to further articulate the current position of the NHS and its activity to make best use of the £200m it invests in the apprenticeship levy. We also welcome any further opportunity to ensure the financial and supply position of the NHS is taken into consideration as new education policy is developed. If you would like to discuss the content of this response further, or you require any clarification on the points raised, please contact Robyn Swain at robyn.swain@nhsemployers.org.

RESPONDENT INFORMATION

15. This response is submitted by Sue Covill, Director of Development and Employment at NHS Employers. We give permission for the Commission to quote our submission and attribute the content to NHS Employers.

April 2019

\(^{13}\) NHS Employers ‘Using apprenticeships to develop a culture of learning’, June 2016