

## **The Nursing and Midwifery Council (NMC) response to Welsh Government consultation on Student Support Arrangements for health related education and training programmes in Wales**

### **About the NMC**

1. As the professional regulator of nurses and midwives in the United Kingdom, and nursing associates in England, we work to ensure these professionals have the knowledge and skills to deliver consistent, quality care that keeps people safe.
2. We set the education standards they must achieve to practise in the UK. When they have shown both clinical excellence and a commitment to kindness, compassion and respect, we welcome them onto our register of nearly 700,000 professionals.
3. Once registered, nurses, midwives and nursing associates must uphold the standards and behaviours set out in our Code so people can have confidence they will consistently receive quality, safe care wherever they're treated.
4. We promote lifelong learning through revalidation, encouraging professionals to reflect on their practice and how the Code applies in their day-to-day work.
5. On the rare occasions that care goes wrong, or falls short of people's expectations, we can step in to investigate, and then take action when needed. But we want to prevent something going wrong in the first place. So, we promote a culture that encourages professionals to be open and learn from mistakes, gives the public an equal voice and where everyone involved is treated with kindness and compassion.
6. If we are to play our part in making sure safe, high quality and consistent standards of care can be delivered, we need to continue to improve. That is why we are working with people, professionals and our partners to co-produce a new long-term strategy, one that will help us support nurses, midwives, and nursing associates to deliver even better, safer care.

### **Summary**

7. Funding within the health and care systems (including in education) impacts directly on workforce - there should be adequate investment to build a sustainable nursing and midwifery workforce now and for the future. Having a fully supported and resourced workforce is key to providing better and safer care for all.
8. Nurses and midwives are a vital part of the health and social care workforce in Wales. As of March 2019, the Welsh workforce included 36,001 nurses and midwives on our register with an address in Wales. We have approved five Approved Educational Institutions (AEIs) to run 116 nursing and midwifery education programmes in Wales.
9. Our response is framed within the context of our remit as the professional regulator. As the regulator, we do not control the structure of the system or how resources are used. We are therefore focusing our response on why funding in education and training is needed to encourage people to train and work in Wales, rather than on the amounts of student support funding required, which others are better placed to comment on.
10. Below can be found a summary of our key views:

- 10.1. There should be adequate investment in education and training to attract individuals from all areas of the community to train as health professionals, ensuring that investment is targeted to remove as many barriers to studying as possible. This is in line with Health Education Improvement Wales (HEIW) and Social Care Wales (SCW) Workforce strategy and the ambition to make education and training more accessible throughout Wales.<sup>1</sup>
  - 10.2. Investment should boost capacity in practice placements: making sure new entrants have a positive experience and alleviating pressure on the experienced professionals who support them.
  - 10.3. Highlighted in the report 'A Healthier Wales,' recruitment and retention can be improved through highlighting the varied and fulfilling roles available in the delivery of quality health and social care services and making the health and social care sector the 'employer of choice' in Wales. As above, this is in line with the upcoming workforce strategy.<sup>2 3</sup>
  - 10.4. Any changes to investment and student support arrangements should be a larger part of creating high-quality education environments that foster a workforce fit for the future in Wales.
11. We are keen to continue collaboration with the Welsh Government in regards to any of the areas touched upon in our response.

### **Our response to the engagement questions**

#### **Q1- the NHS Bursary scheme's intention is to act as an incentive to encourage people to train and work in Wales. In your view, is the Scheme, in its current format achieving this and why/why not?**

12. Increases in life expectancy, demand for care and complexity of care are widely acknowledged as growing challenges for the health and social care workforce. We believe that effective workforce planning- including attracting individuals to the profession to deliver the right workforce with the right skills and education - is key to meeting the challenges of the future and ensuring high quality care and patient safety.
13. Increasing uncertainty and workforce shortages mean that there is a 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 in line with the ambitions of this student support arrangements consultation.<sup>4</sup> We also support the ambition in the consultation on 'A Healthier Wales' to create opportunities to help young people consider a career in health and social care, or to support individuals who would consider a change to a career in health and social care.<sup>5 6</sup>

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<sup>1</sup> Health Education Improvement Wales & Social Care Wales. (2019). A Healthier Wales: A Workforce Strategy for Health and Social Care. Retrieved: <https://heiw.nhs.wales/files/workforce-strategy-for-consultation/>

<sup>2</sup>Ibid.

<sup>3</sup> Welsh Government. (2018). A Healthier Wales: Our Plan for Health and Social Care. Retrieved: <https://www.basw.co.uk/system/files/resources/180608healthier-wales-mainen.pdf>

<sup>4</sup> Welsh Government. (2018). Student Support Arrangements. Retrieved: [https://gov.wales/sites/default/files/consultations/2018-05/student-support-arrangements\\_0.pdf](https://gov.wales/sites/default/files/consultations/2018-05/student-support-arrangements_0.pdf)

<sup>5</sup> Health Education Improvement Wales & Social Care Wales. (2019). A Healthier Wales: A Workforce Strategy for Health and Social Care. Retrieved: <https://heiw.nhs.wales/files/workforce-strategy-for-consultation/>

14. Recent research from the Kings Fund and the Nuffield Trust found that the number of placed applicants for undergraduate nursing was 4 percent lower in 2018 than in 2016 across the UK as a whole.<sup>7</sup> Therefore, we should ensure that attraction to the sector through making the NHS the 'employer of choice' in Wales remains a priority.<sup>8</sup>
15. The systems in place to provide support to individuals during their training should promote and encourage accessibility to all, regardless of background. We welcome the Welsh Government's commitment 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.
16. It is important to ensure that any investment made to support individuals to enter this profession is targeted in a way that assists by removing as many barriers to study as possible. Therefore, student support arrangements should take into account the issues which students see as barriers to entering the nursing and midwifery professions.<sup>9</sup>
17. In particular, the Welsh Government should ensure that any changes to funding arrangements do not disadvantage particular groups such as those who may need to study flexibly or those of certain socioeconomic status.
18. All of the programmes that are currently supported, and will continue to be supported by the NHS Wales Bursary include clinical placements which are a vital and mandatory part of nursing and midwifery studies.<sup>10</sup> We know from recent work by the Kings Fund and Nuffield Trust that the availability of clinical placements in the workforce can act as a bottleneck in the training pipeline, and that the ability to support these placements is particularly challenging when services are under pressure and resourcing pressures mean insufficient trainers are available to supervise.<sup>11</sup>
19. The difficulties and pressures of meeting living costs during nursing and midwifery education may particularly affect mature students who are more likely to have caregiving responsibilities or to have previously accrued debt.<sup>12</sup>
20. Placements are a fundamental way of ensuring that students are exposed to the environments they will be working in post qualification and our standards specify that 50 percent of pre-registration training must take place in practice. High-quality placements not only help with retention by preparing individuals for employment, but also help to prevent individuals from suspending or leaving their studies.<sup>13</sup> It is essential that any changes to student support arrangements are not taken in isolation, but a larger part of a high quality education experience that helps to attract, recruit and retain the workforce fit for the future.
21. In nursing, of UK students who began a three-year degree due to finish in 2017, one quarter (24%) left or suspended their studies. Individuals cited one of the reasons for doing so was

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<sup>6</sup> Welsh Government. (2018). Student Support Arrangements. Retrieved:

[https://gov.wales/sites/default/files/consultations/2018-05/student-support-arrangements\\_0.pdf](https://gov.wales/sites/default/files/consultations/2018-05/student-support-arrangements_0.pdf)

<sup>7</sup> Kings Fund, Nuffield Trust and the Health Foundation. (2019). Closing the Gap. Retrieved:

<https://www.kingsfund.org.uk/sites/default/files/2019-06/closing-the-gap-full-report-2019.pdf>

<sup>8</sup> Health Education Improvement Wales & Social Care Wales. (2019). A Healthier Wales: A Workforce Strategy for Health and Social Care. Retrieved: <https://heiw.nhs.wales/files/workforce-strategy-for-consultation/>

<sup>9</sup> Welsh Government. (2018). Student Support Arrangements. Retrieved:

[https://gov.wales/sites/default/files/consultations/2018-05/student-support-arrangements\\_0.pdf](https://gov.wales/sites/default/files/consultations/2018-05/student-support-arrangements_0.pdf)

<sup>10</sup> Ibid.

<sup>11</sup> Kings Fund, Nuffield Trust and the Health Foundation. (2019). Closing the Gap. Retrieved:

<https://www.kingsfund.org.uk/sites/default/files/2019-06/closing-the-gap-full-report-2019.pdf>

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

that meeting the living costs during nursing training is a significant pressure on students.<sup>14</sup> Student experience and quality of placement were also cited as factors influencing individuals to suspend or leave their studies.<sup>15</sup>

22. Any changes to student support arrangements should be a wider part of creating high quality education and employment opportunities that encourage recruitment and retention for the long-term sustainability of the health system in Wales. We welcome any specific proposals or strategies that focus on preventing attrition throughout nursing and midwifery education.
23. The proposed changes to the Wales Bursary scheme confirm a shift in the balance from tuition fees to living costs, taking the form of a more comprehensive package of support, linked to the National Living Wage, for eligible Welsh-domiciled students. Clinical placements may extend the academic year, include unsocial hours and reduce time available to supplement income by undertaking part time work, and a comprehensive package of support linked to cost of living acknowledges these particular difficulties faced by nursing and midwifery students.<sup>16</sup>
24. With the release of the Diamond review and its key recommendations to make student support arrangements more comprehensive and flexible for Welsh students, it is important to ensure that investment made in education and training provides the right type of support to encourage individuals to consider healthcare as a career, removing barriers which prevent individuals from entering education.<sup>17</sup>
25. HEIW's and SCW's current work to develop a workforce strategy for health and social care includes consideration of incentives and bursaries for shortage areas.<sup>18</sup> We support the need for initiatives to help attract individuals to areas of high need, however these initiatives must also consider overall workforce planning and modelling, education and training. Our response to the HEIW and SCW consultation on 'A healthier Wales: A Workforce Strategy for Health and Social Care' provides further information on our views on these key areas.<sup>19</sup>
26. Investment should support individuals to choose to train as health professionals and support high quality education which encourages the best and brightest to join and remain within the nursing and midwifery professions. Student support arrangements should be a larger part of creating education and employment environments that encourage retention in Wales, (as attrition would be a disappointment for people who have invested so much time and hope in joining a profession) and would build on the long-term sustainability needed to fund the workforce.

**Q2- Our previous consultation provided a clear indication of support for the continuation of the NHS Wales Bursary Scheme. In your view (in ranked order) what do you think are the most important aspects that should be highlighted to attract people to study, train and work in Wales?**

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<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

<sup>17</sup> Welsh Government. (2016). The Review of Higher Education Funding and Student Finance Arrangements in Wales. Retrieved: <https://gov.wales/sites/default/files/publications/2018-02/higher-education-funding-final-report-en.pdf>

<sup>18</sup> Health Education Improvement Wales & Social Care Wales. (2019). A Healthier Wales: A Workforce Strategy for Health and Social Care. Retrieved: <https://heiw.nhs.wales/files/workforce-strategy-for-consultation/>

<sup>19</sup> NMC. (2019). Nursing and Midwifery Council's response to Health Education and Improvement Wales' and Social Care Wales' consultation on 'A Healthier Wales: A Workforce Strategy for Health and Social Care' Retrieved: <https://www.nmc.org.uk/globalassets/sitedocuments/consultations/nmc-responses/2019/nmc-response-to-heiw-and-scw-workforce-consultation-september-2019.pdf>

- **Improving employment opportunities**
- **Achieving a qualification and pursuing an interest in the subject**
- **Receiving a bursary to cover tuition fees**
- **Good maintenance package to cover living costs**

**Based on the previous consultation we have narrowed the responses received to the following two statements, which do you think acts as an incentive to study, train and work in Wales?**

- **Higher maintenance package to cover living costs but the need to pay for tuition fees which only need to be repaid once students reach a certain threshold**
- **NHS Bursary to cover tuition fees which does not need to be re-paid but with a lesser maintenance package to cover living costs**

27. We have no comments on question 2, and are not placed to rank strategies for recruitment to study, train and work in Wales. Many of the above points discuss our views on attracting and incentivising individuals to the nursing and midwifery professions in Wales.

**Q3- If you have been, or now are, in receipt of an NHS Wales Bursary, what influence your decision to study and commit to working in Wales?**

28. We have no comments on question 3.

**Q4- Based on your experiences, what barriers are there that prevent individuals from studying/training and working in Wales?**

29. As mentioned above, we know that the reasons for people suspending or leaving their studies are multi-faceted, the reasons individuals choose to leave the register are also complex, and affect registrants across all four UK countries. Any investment into student support should be balanced with strategies to improve retention and create a sustainable workforce fit for the future.

30. There are many ways in which nurses and midwives can be supported to ensure that their experiences of studying and working are positive ones and encourage them to stay in these important professions. We believe the vital role that nurses and midwives play in the delivery of health and care services should be acknowledged in any strategies to improve recruitment and retention because when people are valued they feel encouraged to stay in their jobs.

31. Making the health and care sector the 'employer of choice' in Wales should also prioritise giving people the time to care. Nursing and midwifery should never be solely focused on the bare minimum need to maintain safety. Nurses and midwives should have the time they need to pay attention to the details that make a difference for the people they are caring for. These are meaningful careers, and it is essential that we nurture and support nurses and midwives so that they can flourish and we can attract the best and the brightest to the profession.

32. As individuals move through training in nursing and midwifery and transition into post-registration practice we strongly recommend a period of preceptorship to provide ongoing guidance and support which requires sufficient investment, but allows consolidation of learning and promotes early career retention. It is essential that this is in place and appropriately monitored.

33. Once they have embarked on their career, it is important that nurses and midwives can continue to learn and develop. This is doubly important with a growing and ageing workforce. As outlined above, nurses and midwives also need to be adequately prepared to

be able to supervise and assess the next generation of students contributing to high-quality education environments which attract and retain students.

34. The opportunity to learn in practice is critical to effective nursing and midwifery education. High-quality practice learning is at risk in times of staff shortages and ongoing financial challenges.
35. High-quality nursing and midwifery education is important in attracting and recruiting individuals to these professions. Our new pre-registration nurse standards, and when agreed the future midwife standards, will be implemented over the next two years and set out ambitious expectations of enhanced clinical skills and knowledge.<sup>20</sup> There has to be sufficient capacity and capability to meet these requirements.
36. Our standards specify that 50 percent of pre-registration training takes place in practice, and is delivered by currently practising registrants who are also simultaneously responsible for providing care to patients. Any increase in overall placement capacity through university recruitment is entirely depending on having adequate numbers of sufficiently qualified nurses and midwives who have appropriate training, and sufficient time to supervise and teach students.

#### **Q5- What could we as the Welsh Government do to eliminate these barriers?**

37. In times of increasing challenge and uncertainty we must maintain and where appropriate increase the number of individuals that choose to pursue education and training opportunities in nursing and midwifery. This requires thinking differently about how services operate, models of care and the nature underpinning education and training programmes required to support the Welsh health system.
38. As mentioned above, reasons for suspending or leaving studies are multi-faceted but include the significant pressure of meeting living costs while in nursing and midwifery training, the availability of high quality placements and practice environments and the overall student experience.<sup>21</sup> Therefore, it is imperative that any investment takes into account these barriers to studying nursing and midwifery and provides a synergistic approach to making the health and social care sector the 'employer of choice' in Wales.

#### **Q6- Below are the top four options that emerged from the last consultation, what in your view are the benefits/risk of each of the four options:**

- **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.**
- **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.**
- **Healthcare students receive the standard maintenance support package and partial funding of tuition fees (ex: 50%) through Student Finance Wales. An NHS Bursary would cover the remainder of the tuition fee and an additional funding**

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<sup>20</sup> NMC. (2018). Future Nurse: Standards of Proficiency for Registered Nurses. Retrieved: <https://www.nmc.org.uk/globalassets/sitedocuments/education-standards/future-nurse-proficiencies.pdf>

<sup>21</sup> Kings Fund, Nuffield Trust and the Health Foundation. (2019). Closing the Gap. Retrieved: <https://www.kingsfund.org.uk/sites/default/files/2019-06/closing-the-gap-full-report-2019.pdf>

**element for additional costs for clinical placements- subject to agreeing a post-qualification employment period.**

- **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.**

39. We have no comments on question 6, and are not placed to specify levels of student funding. Many of the above points discuss our views on the cost associated with training in nursing and midwifery.

## **Conclusion**

40. We are grateful for the opportunity to respond to this consultation on student support arrangements in Wales. While unable to comment directly on levels of funding required, we have framed our response within our remit as the regulator focusing on key reasons why funding is needed within nursing and midwifery education. We would be happy to provide any further information on our response if necessary.