



The Royal College of Speech and Language Therapists' position statement on the Department of Health consultation: Changing how healthcare education is funded

Introduction

In April 2016, the Department of Health (DH) published a public consultation regarding plans to change student funding arrangements for nursing, midwifery and allied health profession students in England. Under the Government's plans, from 1 August 2017, new nursing, midwifery and allied health students will no longer receive NHS bursaries. Instead, they will have access to the same student loans and fees system as other students.

The Royal College of Speech and Language Therapists (RCSLT) is aware that to date the funding settlement for universities and students has been insufficient and there is a need to develop a more sustainable system which offers improved financial support. However, the DH's decision not to involve speech and language therapy course providers and the RCSLT in the development of its proposals prior to the publication of the consultation has meant that many of the plans outlined in the consultation document '[reforming healthcare education funding](#)' do not reflect the reality of speech and language therapy course provision and/or address key challenges faced by students and university staff.

Key issues of concern

The RCSLT's immediate issues of concern regarding the Government's proposals include:

- **The overall content of the consultation:** We are concerned about the lack of specific financial modelling and information regarding the impact of the reforms on allied health professionals. The proposals emphasise an increase in the number of student places but do not appear to recognise the constraints created by placement capacity and the importance of quality and values based recruitment. More broadly, we urge the DH to further consider the non-NHS workforce as part of workforce planning and the wider implications of the healthcare funding reforms for the supply of speech and language therapists (SLTs) in other sectors. As highlighted by the National Audit Office's 2016 report regarding the supply of NHS clinical staff, it is important to acknowledge the importance of the non-NHS workforce. As a consequence of government policy regarding the provision of services by a plurality of providers, a growing number of SLTs are employed within schools, justice, private practice and the voluntary sector.
- **Pre-registration postgraduate courses:** The chapter on postgraduate study in the consultation document does not reflect the reality of course provision (most pre-registration postgraduate courses are two years rather than one year). The level of financial support the DH proposes to make available to pre-registration postgraduate students (up to £10,000) will be insufficient to meet students' tuition fees and living costs, and there is a real risk that the viability of pre-registration postgraduate programmes will be threatened due to a shortfall between university funding and course costs and therefore become less attractive for institutions to offer.

The combination of limited financial support, high levels of debt aversion amongst mature and disadvantaged students and a repayment arrangement whereby postgraduates will have to concurrently repay postgraduate loans alongside repayments of any outstanding undergraduate student loan (unlike students undertaking a second undergraduate degree) are all factors that will make pre-registration postgraduate study less desirable. The overall consequence is likely to be detrimental to the supply and diversity of postgraduate students and could result in pre-registration postgraduate routes only being accessible to students from wealthy backgrounds.

- **Clinical placements:** The proposal that students should contribute an excess of around £300 towards their placement travel costs before costs are reimbursed are inappropriate and impractical for students from disadvantaged backgrounds. We are also disappointed that the consultation document does not reflect accommodation costs for placements which are outside of the university region or reference the importance of maintaining the quality and range of placements on offer to secure the relevant experience and skills required by the SLT profession. The prospect that students will have to pay for temporary accommodation during their placements, whilst continuing to pay for their permanent accommodation at home (and pay towards travel costs) will be impractical for many students.
- **Access and affordability:** We are concerned about access to and the affordability of speech and language therapy courses under the proposed changes to healthcare student funding. Debt aversion amongst mature and disadvantaged students, reduced access to financial support for students with child dependents and the prospect that students will have to make a substantial contribution towards the costs of travelling to placements are factors that may result in a decline in applications from these groups and could threaten the diversity and quality of the SLT student population and the future SLT workforce. It is essential that the DH designs effective measures to mitigate risks of a decline in applications by these students and support their participation.
- **System architecture:** We are disappointed with the lack of detail in the consultation document regarding the system architecture that will underpin the higher education reforms. Whilst we are aware that controls on student numbers will be removed under the new system, it is unclear how pre-registration education will be linked to workforce planning in the future and if, or how, the DH might address a future imbalance in the supply of health students in relation to patient demand. Whilst the move from bursaries to loans will bring undergraduate healthcare students' funding arrangements in line with their peers studying other subjects, it is important for the DH to recognise the distinction between healthcare professionals and other professions, particularly the intensive nature of healthcare courses, and students' role in securing NHS England's vision of high quality care for all in future generations.
- **The timings of the consultation and implementation:** We are frustrated with the current timescales for implementation of the reforms, as they are unrealistic and place university courses providers in an untenable position. The current lack of information regarding funding arrangements is hindering speech and language therapy course providers' ability to plan and provide clear information to prospective students, which could cause a dip in applications. Furthermore, uncertainty regarding funding allocations could mean that courses considered at risk of a funding shortfall may be temporarily suspended, or rested for a year, whilst funding arrangements are resolved.

Whilst we recognise that universities need clarity regarding funding arrangements as soon as possible, we believe that the DH's ambition to publish the Government's consultation response before the parliamentary recess provides insufficient time for proper consideration of submissions made by key stakeholders, such as students, universities and professional bodies to support its implementation.