BRIEFING

Workforce Planning: Speech and Language Therapy in Wales.
Speech and Language Therapists (SLTs) are experts in supporting people with communication and swallowing needs. SLTs work in a range of settings including health and social care, education, and justice. In all other parts of the UK, speech and language therapy is a growth profession. We wish to highlight our significant concerns about workforce planning in Wales from a speech and language perspective, particularly the impact of the streamlining programme and proposed recommendations within the Health Education Improvement Wales (HEIW) Education and Training plan published in June 2022.

**OVERVIEW**

HEIW have maintained commissioning figures for speech and language therapy at 49 for a third consecutive year in the HEIW Education and Training Plan based on Integrated Medium-Term Plans (IMTPs) and workforce intelligence.

RCSLT question the extent to which wider workforce intelligence has been captured for the speech and language therapy profession in Wales and the degree to which the unique policy challenges and opportunities facing our profession have been recognised. We hold individual meetings in other nations with commissioners of training programmes but have been unable to arrange these with HEIW despite repeated requests.

**FACTORs INFLUENCING WORKFORCE PLANNING:**

1. Increasing demand for speech and language therapy services and complexity of service users post-COVID;
   - A number of reports highlight the impact of COVID on speech, language and communication skills (ICAN, 2021, Hendry et al, 2022). This has also been highlighted as an area of concern for Estyn in their annual report (2020-21). This has been recognised by Welsh Government with additional funding in both 2020-21 and 2021-22.

2. Key policy developments which will influence the likely demand for speech and language therapy
   - Expansion of Flying Start – the ETP recognises the impact of the expansion on health visiting staff stating:
     
     ‘The health visiting workforce in Wales will need to be in place to support this wider roll out, ensuring that children and families in Wales have the right support at the right time to meet their needs.’

     The same as health visiting, early speech and language is one of the four pillars of the Flying Start programme. Modelling is also being undertaken by Welsh Government on speech and language therapist capacity to support the rollout. This needs to be considered in commissioning numbers in the same way as it is for health visiting.
- **Mental capacity** – The recently published Welsh Government and UK Government consultations on the Liberty Protections Safeguards adds SLTs to the list of designated Approved Mental Capacity Professionals under proposed changes to the law. This is a significant change and is likely to have workforce implications.

- **Mental health** – the HEIW Strategic Mental Health Workforce draft plan makes several recommendations on new Allied Health Professional (AHP) roles and pathfinders. We have made a strong case for SLTs to be included in these new roles given the link between mental health and communication and swallowing difficulties. Again, this has potential workforce implications.

- **Youth Justice** – The Senedd Equalities and Social Justice Committee is undertaking a spotlight inquiry to help provide a better understanding of the extent of speech, language and communication needs (SLCN) amongst young people who have offended or are at risk of offending in Wales. We strongly suggest this will lead to recommendations to increase the numbers of SLTs in youth justice services as recommended by a Senedd committee a decade ago (Communications and Culture Committee, 2010). NHS Managers across Wales are also negotiating with Youth Justice Services about SLTs being embedded in their teams prior to the inquiry.

Given this intelligence, we wish to question whether local health boards being bound by the level of finance that has already been agreed with speech and language therapy services and therefore impacting on what they can include in their IMTP is appropriate as the indicative factor for commissioning training places for speech and language therapy. We are concerned, that this does not take into account positions needed in 3-4 years time.

3. **Parity with other Allied Health Professionals (AHPs)** – Other AHPs have seen significant growth in commissioning numbers over recent years with increases between 18 and 43% and have also seen increases this year.

- Dietetics – increased by 22% since last year
- Occupational Therapy increased by 10%
- Physiotherapy – increased by 3% following steep increases in recent years. (HEIW, 2022)

Speech and Language Therapy places increased by 11% in 2020 from the traditional number of 44 places and have remained stagnant since then. We are uncertain of the rationale for speech and language therapy places remaining stable given the demand referenced above.

4. **Parity with other nations** – All other parts of the UK are witnessing increases in student SLT numbers.

- Northern Ireland have recently announced a 18% increase in commissioned spaces
- RCSLT membership records suggest that the number of SLTs qualifying in England has doubled in the last decade.

*Our membership data reveals that there are fewer SLTs per head of the population in Wales than any other part of the UK. We need to increase commissioning numbers and be bold about considering placement capacity.*

5. **Composition of the workforce** – We would be keen to see greater detail on the workforce analysis undertaken on the speech and language therapy profession. Speech and language therapy is currently female dominated and part-time working is very common. Locum supply is an issue in a number of areas and there is a pressing need for diversity (both in terms of people in the workforce and in the training they have undergone). We are aware that the needs of newly qualified SLTs may be greater currently given their training was affected by COVID restrictions. As a college, we are leading work on these pinch points and would be keen to share learning.

6. **Clinical placements** – We are aware that clinical placements may be a restricting factor for the commissioned number. We welcome the funding of the placement education facilitators in local health boards by HEIW but believe a discussion is required with regards to placement capacity to support future growth and development. We are engaged in such conversations in other nations.

7. **Health Care Support Worker (HCSW) Development** – We would be keen to understand how the HEIW Education and Training Plan addresses the need to take from clinical time to deliver and assess qualifications by HCSWs, especially in a ‘Once for Wales’ way. This is very significant for smaller professions such as ours.

8. **Impact of the streamlining programme** – We are very aware that streamlining has significantly altered the way local health boards recruit and has led to a range of unintended consequences. We would like the opportunity to discuss this impact in light of the recommended commissioning figures.
Streamlining

The Student Streamlining Process is a programme specifically tailored to match student health professionals to positions in Local Health Boards in preparation for when they complete their studies. Speech and language therapy entered the programme in 2020/2021. We understand the original aims behind the streamlining process and believe that it has significant potential for larger professions. However, two years into the process, we are very concerned that streamlining does not meet the needs of speech and language therapy and warnings about the impact on the profession and commissioned numbers have not been heeded. The 54% scheme allocation for speech and language therapy – the lowest of the AHP professions in the second year of the scheme clearly demonstrates the issues with the process.

We call for serious consideration of the removal of the profession from the process and exploration of alternatives.

OUR MAIN CONCERNS

Diversity within the profession

Streamlining is leading to lack of diverse training experiences.

Until 2025 and the gradation of the first cohort of students from the new undergraduate course at Wrexham Glyndŵr we will be relying on a single cohort of students from Cardiff Metropolitan University to fill all posts under the streamlining programme.

Traditionally Health Board speech and language therapy services have recruited from undergraduate and postgraduate courses across the UK. Speech and Language Therapist pre-registration courses vary in emphasis on different aspects of training. For example, Birmingham and Cardiff Metropolitan University have an emphasis on bilingualism, Sheffield has a medical emphasis and Reading has an emphasis on linguistics. It is extremely valuable to the profession in Wales to have graduates with diverse training experiences in terms of developing quality services, and as a profession we want to maintain this.

Streamlining is restricting the richness and diversity of the future workforce.

We welcome the decision to approve Wrexham Glyndŵr University as a provider of a new Speech and Language Therapy course in North Wales. However, this is not due to commence until 2022 with the first graduate cohort in 2025 at the earliest. There is no current or planned postgraduate or part time speech and language therapy courses in Wales. This limits our workforce for the next three years to under-graduate, newly qualified practitioners who could commit to a full-time course in South-East Wales.

We are keen to develop a more diverse speech and language workforce to better reflect the populations we serve. This aligns with the ambitions expressed within the Welsh Government Race Equality and LGBTQ+ Action Plans. We are concerned about the impact of recruiting from one student cohort for the future of the profession.

Streamlining is shutting out Welsh students who studied outside of Wales and previous bursary holders who graduated pre-2020-21 from the future workforce.

A range of personal reasons and historic over subscription of the Cardiff Metropolitan University speech and language therapy course will have resulted in students studying elsewhere with the aim of returning to Wales to work. Data from a small-scale survey we have undertaken with universities over the border suggests that Marjon, Reading, Sheffield, Queen Margaret, De Montford, Leeds Beckett, Manchester and Birmingham universities are all currently training significant numbers of Welsh students who had planned to return to work in Wales.

Many students and higher education institutions have contacted us from outside Wales stating they were unaware of the streamlining programme when students applied for their courses. A number of students have shared that they would have made different decisions had they been fully appraised of the facts. This stance particularly discriminates against mature students or those with caring responsibilities or disabilities who are less able to be mobile.

Additionally, graduates who received the bursary in previous years and have been working in Health Boards in Wales on fixed term contracts have been unable to apply for permanent band 5 roles through this process potentially leading to a loss of built up knowledge and skills, contrary to the stated aim of the programme to attract graduates with the right skills.

Due to the small size of the profession, only a small number of Health Board departments in Wales had vacancies outside of streamlining which affected all graduates in these exclusion groups. This may differ significantly from the position of other larger health professions such as nursing.

Royal College of Speech and Language Therapists. Report: Workforce Planning on the future of the Speech and Language Therapy profession in Wales.
Streamlining is affecting our ability to deliver Welsh language services.

Speech and language therapy is highlighted as a key priority area within the Welsh Government *More than Just Words* framework regarding Welsh language provision. There is usually a small number of students at Cardiff Metropolitan University who are able to practice in English and Welsh. Previously services have recruited graduates who can work in Welsh from universities outside of Wales. Services are concerned that under the streamlining process they may not be able to recruit Welsh speakers which will have an impact on their ability to deliver the active offer. As an example, there may be a particular impact on the ability of services to meet the bilingual requirements of the Additional Learning Needs and Educational Tribunal Wales Act.

Inflexibility of streamlining is impacting service delivery and increasing waiting times.

Some children and adults are having to wait longer to see SLTs. Implementation of streamlining in Speech and Language Therapy has forced some Health Board departments to wait until the Autumn for the graduates to start work when they were needed earlier.

Conversely, some Health Board departments have had to take graduates earlier (rather than throughout the year) and in greater number than needed at that time which is placing a significant financial burden on departments or wider within Local Health Boards.

A large intake of graduates places a very high demand for supervision on a department. Usually such recruitment would be spread over a longer period of time which eases this demand. This reduces the capacity for clinical work carried out by staff who are working as supervisors to new graduates.

Streamlining does not take sufficient account of the fact that speech and language therapists are employed outside of the NHS

Speech and language therapy is a small profession with a low turnover of staff. Speech and Language Therapists in Wales are employed and managed in a variety of settings and are not all operationally managed by the Professional Head of Speech and Language Therapy in the Health Boards. They may be operationally managed within multidisciplinary therapy teams, within specialist services or within multiagency teams such as Flying Start. As such, commissioning figures may include numbers for specialist services not managed by the Head of Services and services commissioned by outside agencies and dependent upon non-substantive funding streams which cannot accurately be predicted three years in advance yet the financial risk does not appear to be shared.

Streamlining will have long-term consequences for professional progression.

NHS Services previously indicated to us that continuation of streamlining unaltered is likely to have a significant, detrimental effect on future commissioning numbers and therefore the profession with several services indicating that they might request far fewer commissioned places in commissioning for graduates in 2025. This could potentially jeopardise the viability of a second course. We believe the process may also impact on the supply for band 6 and 7 posts. There is significant concern about the potential that if over-recruitment occurs at band 5, services will either need to restrict band 6 posts to internal applicants or may struggle to gain approval for band 6/7 posts if over-established at band 5. There is a very real danger of lack of professional progression leading to a log jam of band 5s with insufficient structure above them to provide services safely or develop the next cohorts of Band 5 staff. This could become magnified over successive years and perpetuate unacceptable gaps at middle grades.

**OUR VIEW**

The right graduates and those who are aligned with Welsh Services and the Welsh agenda will include those who live in Wales and speak Welsh but have studied closer to their home and outside of Wales rather than Cardiff Metropolitan University as described previously. The fact that all students from Cardiff Metropolitan University (regardless of whether they received the bursary or not), were included in the process means the motivation of students to apply for posts may not be in line with this aim.

Long-term, our concerns around equity highlighted above will have significant impact on the ability of the profession to recruit a diverse workforce which meets the needs of our multi-lingual population and the stated aim of the streamlining programme.

The 54% scheme allocation for speech and language therapy – the lowest of the AHP professions in the second year of the scheme clearly demonstrates the multiple issues with the process from the perspective of our profession. We are very concerned that this is being interpreted as an indication of a decrease in SLTs required. As described earlier in the process, this is
Given the scale of our concerns about future workforce planning for the profession, we would be very keen to meet with the Minister as an individual college.

FURTHER INFORMATION

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