

Office for Students consultation on implementing savings in academic years 2019-20 and 2020-21

Chartered Society of Physiotherapy response

Completed by online survey <https://survey.officeforstudents.org.uk/s/savingsconsultation/>

Summary of CSP recommendations

- The proposed cuts to the level of funding for physiotherapy education (per head), and other health subjects will slow down and could reverse growth in workforce supply.
- This risks delivery of the Long Term Plan and the workforce growth necessary for this, which were headline commitments in the Conservative Party Manifesto
- The presentation of the proposed cuts to high cost and high priority health courses are misleading and are higher than the consultation suggests
- The Office for Students has failed to protect the high cost/high priority health subjects as requested by the Secretary of State for Education
- The CSP urges the planned cuts in recurrent teaching grant funding for health subjects be paused in light of this guidance and the need to deliver the strategic workforce objectives of the Department of Health and Social Care.

1. To what extent do you agree with our proposed approach to securing savings in the academic year 2019-20?

Strongly disagree

The reasons are as follows:

- 1.1 The proposed cuts in the recurrent teaching grant funding, per head, risk stifling growth in the physiotherapy workforce, just at the point when growth is essential to meet objectives of the Department of Health and Social Care with delivery of the NHS Long Term Plan. The same is true of other health subjects that are high cost and high value, including nursing, midwifery and other allied health professions.
- 1.2 There has been significant growth in pre-registration physiotherapy provision in the last five years (around 41%), but this trend must be sustained and ongoing to meet Long Term Plan and Government targets.
- 1.3 As part of this, there has been a welcome expansion in the number of universities offering physiotherapy courses, contributing to this growth. In 2019/20 there are two new physiotherapy course providers confirmed, and a further five in the pipeline - an increase in numbers of providers of 14%.
- 1.4 The proposed approach to securing savings in academic year 2019-20 from funding for new providers reduce their funding at the point when they have additional set up costs. This will deter new providers and potential new providers from continuing with their plans for physiotherapy provision.

2. To what extent do you agree with our proposed approach to securing savings in the academic year 2020/2021?

Strongly disagree

The reasons are as follows

- 2.1 The proposed cuts in the recurrent teaching grant funding, per head, risk stifling growth in the physiotherapy workforce and the rest of the health workforce, just at the point when growth is essential to meet key objectives of the Department of Health and Social Care.
- 2.2 The Department of Health and Social Care is committed to delivery of the NHS Long Term Plan. The Conservative Party Manifesto promises workforce growth to deliver this: by 2024/5, 6,000 more doctors and trainees in general practice and 6,000 more other primary care professionals like physiotherapists and pharmacists, 50, 000 additional nurses.
- 2.1 The university courses to train this workforce are correctly identified by the Office for Students as high cost and high priority. Office for Student's recurrent teaching grant funding has been essential to meet the additional costs of physiotherapy and other health courses. Growth in provision would be negatively impacted by these cuts.
- 2.2 There has been significant growth in pre-registration physiotherapy provision in the last five years (around 41%), but this trend must be sustained and ongoing to meet Long Term Plan and Government targets. This has been achieved through the funding as a high cost/high priority subject from the Office for Students (previously HEFCE) coupled with the removal of the previous caps on places has resulted in the welcome increase in provision after many years of under supply.
- 2.3 The per capital cut in funding from the recurrent teaching grant for the high cost/high value medical and health courses, including physiotherapy is much higher than the 3% referred to in the consultation document. While this is not made clear in the consultation document, we understand that the per capita cut proposed is likely to be double this. It is inevitable that any cuts will act as a break on growth and risk it going into decline.

3. Do you have any comments about any unintended consequences of these proposals, for example, for a particular type of provider or for particular types of student?

- 3.1 The CSP fears that those physiotherapy courses most negatively impacted by the proposals are ones in universities that don't have large nursing course, and therefore in departments less able to absorb the loss.

4. Do you have any comments about the potential impact of these proposals on individuals on the basis of protected characteristics?

No

5. Do you have any other comments about the proposals?

- 5.1 The need to grow the health workforce to deliver the Long Term Plan is well understood and reflected in the plan itself and the Interim People Plan, as well as the Conservative Party Manifesto. The proposals from the Office for Student undermine a concerted effort to deliver this workforce, impacting as it would on physiotherapy, other allied health, nursing, and midwifery training.

- 5.3 The particular importance of growing the domestic workforce in the context of reductions in the NHS workforce moving to the UK from other countries has been explicitly recognised and committed to by Government in many occasions since 2017.
- 5.4 There has been a strong growth in pre-registration physiotherapy provision since 2015/16, but this trend must be sustained and ongoing to meet LTP targets.
- 5.5 Office for Student recurrent teaching funding is essential to meet the additional costs of physiotherapy and other health courses. Costs of physiotherapy courses were £10,342 (mean) and £10,397 (median) per student in 2017. (*Costing study of pre-registration nursing, midwifery and allied health disciplines, Report to HEFCE by KPMG 2017*). Cutting the current teaching grant, per head, means these costs are no longer met.
- 5.6 CSP accreditation of physiotherapy courses is only granted for providers with a ratio of lecturer to student in line with it's own and the regulators (the Health and Care Professions Council) requirements. Staff time in universities is also required to manage student placements. It is therefore not realistic for physiotherapy courses to cut costs in line with the cuts proposed through changes in how course are provided. All health courses will be a similar to this.
- 5.7 The effect of this is likely to slow down growth or shrink provision, and therefore supply. It could also drive an increase in international students to cross-subsidise courses, as has happened in Scotland. As most international students either wish to practice abroad, or face restrictions if they want to work in the UK after registration, this would also reduce domestic supply, and takes up a valuable supply of work placements for students. With either market reaction, the result is a break on workforce supply.
- 5.8 We believe that the consultation document is misleading to present this as a 3% reduction in funding. Once the additional costs of growth has been taken into account, the funding for the teaching grant for high cost/high priority courses as a per capita figure would appear to be reduced by at least 6%.
- 5.9 We note the fact that the letter from the Department for Education asks that funding for higher cost and priority subjects are protected. These proposals do the opposite of this.
- 5.10 We note, as above that the proposed cuts in funding for health courses undermines the strategic priorities for health of the current Government. (see 5.2)
- 5.11 We also note that failing to protect the funding for physiotherapy courses is out of step with the Office for Students strategic objectives: demand for physiotherapy courses from potential students and the healthcare system continues to outstrip supply and the proposed cuts will considerably worsen that position. Physiotherapy courses also deliver value for money for taxpayers, students and employers, with high translation to practice, low attrition rates, and high quality courses able to require high quality students.



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For further information on anything contained in this response or any aspect of the CSPs work, please contact: Rachel Newton, CSP Head of Policy 0207 306 6624 / newtonr@csp.org.uk