

Education Select Committee, Apprenticeships Inquiry Evidence from the Chartered Society of Physiotherapy

The Chartered Society of Physiotherapy (CSP) is the professional, educational and trade union body for the UK's 57,000 chartered physiotherapists, physiotherapy students and support workers.

Physiotherapists are autonomous practitioners, able to independently assess, diagnose and treat. The contribution of physiotherapy can be seen at many points of a care pathway as physiotherapists work as clinical leaders and multi-professional team members, to support people to recover and maintain health in hospital, home, community work, and leisure environments.

A Bachelor's or Master's degree in physiotherapy is required to register and practise as a physiotherapist in the UK. Physiotherapy students and education were previously funded through NHS bursaries and the benchmark price tariff. In the 2015 Comprehensive Spending Review, these arrangements were replaced by tuition fees and student loans for students entering BSc programmes from 2017/18 (confirmation is still awaited on funding arrangements for Master's level students and programmes from 2018/19).

A new physiotherapy degree apprenticeship standard received approval (subject to minor amendments) in December 2017. The assessment plan is due to be submitted for approval early in 2018.

The CSP supports the principle for the development of apprenticeships relating to the physiotherapy workforce as a way of increasing workforce supply to meet demand. This is providing that the quality of the learning experience and outcomes - and therefore the quality of service delivery and patient care - are upheld.

The CSP has actively inputted to the development of apprenticeship opportunities over the last year to seek to optimise their quality and currency. CSPs evidence focusses on areas of action to mitigate or avert potential risks to apprenticeships' development.

Summary of our key points

- The CSP supports the principle of apprenticeships as a way of increasing the physiotherapy workforce supply to meet demand at all levels – including entry to the profession, support worker roles and advanced practice roles
- There are risks that opportunities for workforce and skills development through apprenticeships will not be optimised at a key time of need (including in the context of Brexit)
- There needs to be clarity about how apprenticeships (including at degree level) will help to meet workforce needs within health and social care
- There needs to be clarity about how the new, complex infrastructure for apprenticeships is being developed and applied at degree apprenticeship level and to ensure that both new and established quality assurance arrangements coalesce in a robust, efficient way
- There are current unknowns about whether the new financial model on which apprenticeships are founded is tenable (for both employers and education providers)
- There are practical challenges for employers to take on apprentices; e.g. given the additional costs relating to backfill and the demands of supporting high-quality on-the-job learning
- For all these reasons, it is currently unclear whether good-quality learning/career development opportunities can be provided to apprentices from all backgrounds and in ways that actively contribute to meaningful workforce/skills development at a key time of need.

1. The quality of current provision

- 1.1 Physiotherapy apprenticeships are new, and still in the process of development. While we therefore cannot comment on the quality of current provision, we are strongly committed to ensuring that the quality of future provision is assured.
- 1.2 This is of the utmost importance for ensuring that high standards of physiotherapy education and practice are maintained; the potential for the physiotherapy workforce to lead, develop and deliver high-quality services is optimised; and that the quality of patient care is upheld.
- 1.3 We are also keen to support use of high-quality apprenticeship opportunities to grow and develop the physiotherapy workforce, in line with changing population, patient, service and workforce needs.
- 1.4 Through our active contribution to apprenticeship developments over the last year, we are aware that the novelty of developments from a number of perspectives makes the availability, quality and currency of apprenticeship provision (across workforce and skills areas - not within physiotherapy, in particular) potentially vulnerable. This is for the following reasons:
 - Degree level apprenticeships are relatively new across all sectors and settings, both for employers and education providers - their development and delivery is therefore relatively untried and tested
 - Apprenticeships in healthcare and within the NHS in particular are relatively new; this is especially the case in relation to clinical/frontline roles and professional roles for which registration with a statutory regulator is a requirement
 - The updated infrastructure for apprenticeships is still new, the funding model is untested, and the application of apprenticeship requirements (including in relation to regulated professional roles and education provision for which there are established quality assurance arrangements) is still being refined
 - Awareness, understanding and engagement in apprenticeship developments (within healthcare, at degree level, and in relation to regulated, professional roles) have still to be developed, such that creative solutions to their delivery have yet to be formulated and for their potential benefits to be realised.
- 1.5 The following are specific examples of this:
 - There is an urgent need to achieve clarity on whether apprenticeships can be delivered at more than one academic level; individuals have been able to qualify as a physiotherapist through either an undergraduate or postgraduate route for over twenty years, with both routes making a very valuable contribution to workforce supply - however, current apprenticeship arrangements and requirements do not accommodate this approach
 - While we have contributed to averting its being a risk in respect of physiotherapy, there is the potential for apprenticeship routes not to align fully with regulated, registered roles, thereby creating potential public protection issues.
- 1.6 We therefore see the following as being of particular importance:
 - More work needs to be done to understand and address areas of ambiguity and potential weakness, recognising that this needs to involve input from multiple sectors and agencies (including government arm's length bodies, employers, education providers, regulators, professional bodies and trade unions)
 - There needs to be stronger cross-department collaboration within government, such that apprenticeships' contribution to meeting workforce supply needs in key areas of workforce and skills demand is fully and coherently addressed

- Apprenticeship funding, systems and requirements and their implementation need to be carefully and fully evaluated; this includes in the context of a broader developments and changes in relation to workforce/skills development needs and pressures.

2. The effectiveness of the quality monitoring system

- 2.1 We are actively engaged in supporting the development of apprenticeships relating to the physiotherapy workforce. We are pursuing clarity on how a meaningful quality monitoring system can be developed and applied, again recognising that we are operating with colleagues in a broad context of novelty in how apprenticeship arrangements are implemented.
- 2.2 In particular, it is not yet fully apparent how arrangements that have been developed for assuring the quality of apprenticeships that sit outside higher education levels and structures will appropriately be applied to degree apprenticeships. This creates the risk that different processes and systems will 'collide', creating unnecessary bureaucracy and undermining the purposes that they are designed to serve.
- 2.3 We therefore see the need for the following:
- Clarity about whether and how established quality assurance arrangements within higher education will be used to ensure the quality of degree apprenticeships, recognising that Ofsted does not play a role in this context and that the full role of the Quality Assurance Agency for Higher Education (e.g. in relation to whether it can act in the role of external quality assurance provider) has yet to be defined
 - Recognition of the role that statutory regulators and professional bodies play in assuring the quality of professional education, including in response to changing employer/service needs; to uphold the public interest and patient safety; and to ensure the currency of the professional knowledge and skills and professionalism of all members of the workforce
 - Clarity on how the quality of learning outcomes of apprentices is defined, particularly through how assessment plans and the end-point assessment for degree apprenticeships are approved; e.g. to ensure that these meaningfully and proportionately test level 6 and level 7 learning, in line with standard Bachelor and Master's degree requirements, and that degree-awarding processes are not undermined
 - Ensuring that the learning developed and gained through the early implementation of degree apprenticeships is shared across sectors and bodies to inform and enhance skills development across all parts of the workforce (through discussions with colleagues in very different sectors and skills areas, we have identified shared areas of concern and interest in respect of degree apprenticeship developments)
 - Ensuring that learning developed and gained through the Institute for Apprenticeships' scrutiny and approval of apprenticeship proposals, standards and assessment plans is applied and shared
 - Clarity about how the complex infrastructure for apprenticeships is being developed and applied at degree apprenticeship level (e.g. how requirements sit with existing quality assurance structures within the university sector, including in which Ofsted does not have a role).

3. The impact of different funding models

- 3.1 It is too early to judge the impact of the new funding models for apprenticeships on developments within physiotherapy. However, we have broad concerns about the potential impact of the levy and tariff arrangements now in place. In particular, the following seem to be risks:

- Employers are not able to make strategic, timely use of their payment of the levy, and will therefore either accept payment of the levy as an additional ‘tax’ or create apprenticeship opportunities simply to use the levy, rather than to meet defined workforce needs in strategic, sustainable ways
- In line with the above, the full impact of an employer-led approach to apprenticeship developments (in tandem with an open market for higher education) will fail to meet workforce development needs in high-priority areas (in ways that will impact negatively on workforce supply at a critical time and delimit skills development opportunities for individuals); this is a key issue within health and social care, including in the context of the recent publication of the draft NHS workforce strategy
- Employers are not able to afford to employ apprentices to make good use of the levy to meet their workforce development needs; i.e. because the costs of employing individuals and making appropriate backfill arrangements for apprentices’ off-the-job learning are too high to create a viable model of delivery (and have the potential to compromise service delivery to patients)
- Employers are not able to invest the time and money in staff development to create the workplace capacity to support high-quality apprenticeships and on-the-job learning; current pressures in the delivery of care to patients seem at strong risk of working against viable apprenticeship developments in healthcare
- Neither employers nor education providers are able to develop apprenticeship arrangements that are sustainable; i.e. because the costs are too high and the timelines too long to create a viable workforce development route for employers, while the funding available and number of apprentices involved do not generate sufficient economies of scale to be viable for education providers
- Neither employers nor education providers have the capacity to engage in the contract negotiation, procurement and collaboration required to deliver apprenticeships at scale and in sustainable, high-quality ways
- The tariff bands attached to specific apprenticeships are not sufficient to meet the actual costs of delivering apprenticeships; therefore, education providers are not able to meet employer demand.

3.2 We are keen to explore how these potential risks to apprenticeships’ development and delivery can be averted. We are currently engaged in activity with our members and other bodies to explore meaningful approaches to addressing them.

3.3 We see a full evaluation of the viability and impact of the new funding model (including an appraisal of its unintended consequences) as essential.

4. The quality of learning opportunities

4.1 We see issues relating to the development of high-quality learning opportunities for individuals from all parts of society (including entry routes to professions such as physiotherapy) as linked fundamentally with our points about workforce supply, quality assurance and funding.

4.2 One of our key reasons for supporting apprenticeship developments in principle (in addition to addressing shortages of physiotherapy workforce supply) is to enable individuals from all parts of society to join the physiotherapy profession and to ensure that the profession is representative of the populations and individuals it serves. This now has increased importance in the context of individuals having to take out student loans to qualify as a physiotherapist through a university-based route in England.

4.3 In this context, we are concerned to help to ensure the following:

- Apprenticeship routes are demonstrably and seen to be equitable in their quality with established learning and development routes, rather than of a lesser standard

- There are genuine opportunities for individuals to pursue apprenticeship routes, rather than these existing 'on paper' (i.e. approved by the Institute for Apprenticeships for delivery), but not available in reality (e.g. because the funding model does not make them viable for delivery by employers and education providers)
- The structures and requirements that necessarily define apprenticeships in appropriately robust and consistent ways enable workforce development in response to skills development and employer needs, rather than potentially inhibiting this (e.g. because requirements work against meaningful apprenticeships being developed and delivered)
- The profile of individuals who are enabled to start and progress successfully through apprenticeships at all levels is fully evaluated
- Opportunities for individuals to progress and develop in their career through apprenticeships are enabled and evaluated (in line with the ethos of apprenticeships), rather than there being the risk that such progression is hindered by misaligned apprenticeship routes at different levels.



Professor Karen Middleton CBE FCSP MA
Chief Executive
Chartered Society of Physiotherapy

5th January 2018

- ends -

For further information on anything contained in this response, please contact:

Rachel Newton
Head of Policy
The Chartered Society of Physiotherapy
14 Bedford Row
London
WC1R 4ED
Telephone: 0207 306 6624
Email: newtonr@csp.org.uk
Website: www.csp.org.uk