

Department for Education
By email: level7.APPRENTICESHIPS@education.gov.uk

18th December 2024

Dear Sir or Madam,

Re: Chartered Society of Physiotherapy's response to government plans to remove level 7 apprenticeships from levy funding

The Chartered Society of Physiotherapy ('CSP') is the professional, educational and trade union body for the UK's 65,000 chartered physiotherapists, physiotherapy students and support workers.

CSP are calling for an exemption to health and social care apprenticeships from the decision to defund level 7 apprenticeship programmes.

Level 7 (post-registration) apprenticeships support physiotherapists and other healthcare professionals to advance their careers whilst developing high level expertise that fills critical skills gaps across healthcare and enable them to deliver change within the NHS.

The advanced clinical practitioner (ACP) apprenticeships are therefore vital to the health and social care sector, with 3140 starts on programmes between 2019/20 and 2021/22 ([Apprenticeships and traineeships, Academic year 2021/22 - Explore education statistics - GOV.UK](#)). 88% of 101 NHS trusts surveyed in 2022 were utilising the ACP apprenticeship and it was the fourth most used apprenticeship out of 196 standards in use by the trusts at that time (<https://haso.skillsforhealth.org.uk/wp-content/uploads/2023/03/2023.02.01-The-NHS-Apprenticeship-levy-Study-the-2022-edition.pdf>).

In addition, new programmes are currently in development to deliver the newly developed physiotherapy schema that underpins the Enhanced Clinical Practitioner (ECP) apprenticeship standard (a level 6 standard due for delivery at level 7 given that pre-registration physiotherapy training is already delivered at level 6).

Optimising the value of physiotherapists

Advanced practice physiotherapists transform and modernise pathways of care to meet local health needs. They use complex decision-making within multiprofessional teams, and work across the health and social care system to enable quality and integrated care.

Timely access to high quality rehabilitation is a critical part in tackling the urgent problems facing the health and social care system and improving patient outcomes so people can live as well as possible. Advanced practice physiotherapists play a critical role in many care pathways including urgent and emergency care, frailty, stroke, musculoskeletal services, community rehabilitation and primary care. New models of care will require a greater proportion of registered physiotherapists to be operating at enhanced and advanced levels of practice in order to assess and meet the needs of patients with multiple conditions and manage demands on the rest of the health care system, including reducing pressures on consultants and GPs. See [here](#) for CSP member case studies of advanced practice physiotherapists and their roles.

This is recognised in the Long-Term Workforce plan, which commits to the expansion of advanced practice roles to address rising health inequalities and population need. The plan states an ambition to increase the number of clinicians starting advanced practice training pathways by 46% to 5,000 by 2028/9, increasing to 6,300 each year by 2031/32. Removing levy funding from advanced practice pathways is in direct contradiction to this ambition and means this will be impossible to achieve, the impact of which will be felt directly by patients.

Retention

NHSE data on retention suggests that around 7% of physiotherapists who work for the NHS leave to carry on practicing in other sectors and that for half of these it is clinicians early in their career (aged 25-29). CSP insight suggests this is partly due to a lack of training offers and a lack of career progression opportunities.

There is an urgent need to create a clear career pathway for physiotherapy staff and level 7 apprenticeships are a core part of that pathway. This would create the pipeline for roles required by the system, optimise the value of the workforce as well as support retention by reducing the high volume of registered physiotherapists who leave the NHS in the early phase of their career. The ECP apprenticeship was developed partly in response to this need and fulfils a key part of that middle-career pathway that has been missing until now.

Removing the apprenticeship funding during this crucial development stage of ECP programmes is a lost opportunity to embed much needed training and support for a large part of the physiotherapy and other AHP workforce. If physiotherapists see even less opportunities to progress to enhanced or advanced practice within their careers, this would clearly be detrimental to retention and exacerbate the current high vacancy rate for physiotherapists. This is in direct opposition to the government pledge to improve staff retention in the NHS.

Diversity and social mobility

Level 7 apprenticeships support social mobility by providing opportunities for physiotherapists who may not have access to alternative sources of funding to undertake further training. NHSE's Centre for Advancing Practice determines the requirements for advanced level practitioners to achieve Centre recognition, which is an advanced practice master's level qualification (if applying via a taught route). This takes a minimum of three years to complete and requires a high degree of employer support.

Statistics for each profession undertaking the ACP apprenticeship are not captured at a national level therefore it is not possible to analyse the impact of this specific

apprenticeship standard on diversity. However, a review of the apprenticeship levy across all levels of standards, saw consensus that apprenticeships has improved equality, diversity and inclusion across at least 60% of the NHS organisations surveyed (<https://haso.skillsforhealth.org.uk/wp-content/uploads/2023/03/2023.02.01-The-NHS-Apprenticeship-levy-Study-the-2022-edition.pdf>).

Funding

An estimated one third of advanced practitioners gaining recognition from the Centre for Advancing Practice, currently train via the apprenticeship route. The apprenticeship route is the default NHSE funding pathway for advanced practice programmes in some regions ([Funding for MSc Advanced Clinical Practice Programme - 2024 / 2025 - Advanced Practice](#)). The impact of defunding would therefore be felt disproportionately across regions and could undermine specific efforts to utilise apprenticeships to improve recruitment and retention, for example in coastal and rural areas.

It should not be assumed that level 7 training opportunities will automatically be funded by NHS or social care employers, should the levy be withdrawn. Pressures on continuing professional development (CPD) funds will result in the opportunities to develop into these roles becoming much more limited, introducing greater inequity. Whilst employers may choose to commission the programmes outside the levy, this creates cost elsewhere in the system, thus there will be no cost saving to the employers. Any impact on the availability of education pathways into enhanced or advanced practice will negatively impact patient care.

Impact on education providers

There are at least 54 providers of the multiprofessional ACP apprenticeship standard ([Training providers for Advanced clinical practitioner \(integrated degree\) \(level 7\)](#)). At a time when Higher Education Institutes (HEIs) are under significant financial constraints, removing apprenticeship levy funding puts the sustainability of advanced practice programmes as a whole at risk. Without the assurance of the levy and continued guaranteed uptake of places, some advanced practice programmes will become less viable and could cease to be offered. This risks destabilising the entire post-graduate enhanced and advanced practice education pathways for physiotherapists and other healthcare professionals.

In addition, HEIs are no longer in a position to develop new programmes that could be perceived as being 'at risk', such as the new ECP apprenticeships, thereby jeopardising the implementation of a significant workforce development strategy, designed to support patient care and retention of staff.

The uncertainty around level 7 funding is creating instability in the higher education sector with HEIs pausing development of new courses or recruitment to existing programmes. We therefore call for a rapid decision to provide this exemption and communicate this quickly to education providers.

We would be pleased to share our thoughts in more detail. To arrange a meeting, please email Ashley James, Director of Practice and Development at jamesa@csp.org.uk,

Yours sincerely

A handwritten signature in black ink, consisting of a stylized capital letter 'A' followed by a horizontal line extending to the right.

Ashley James

Director of Practice and Development

