

# Physiotherapy should be added on the shortage occupation list

## Introduction

0.1 We believe that physiotherapists and therapy support workers should be added to the shortage occupation list, if it is to continue as a feature of the points based immigration system.

0.2 Without inclusion physios will not qualify for work visas in future as the tariff in the new points based system will not guarantee enough points for starting grade NHS clinicians, unless their profession is on the list. This will create significant problems in meeting the growing demand for physiotherapy.

0.3 The Chartered Society of Physiotherapy (CSP) is the professional body, trade union and educational body for physiotherapy in the UK. We have over 59,000 members who are qualified physiotherapists, physiotherapy support workers, physiotherapy students or retired physiotherapists. 84% of registered physiotherapists in the UK are CSP members.

0.4 There is growing demand for physiotherapy due to; post Covid rehab needs, an aging and longer working population, population growth, growing numbers of people with multiple long-term conditions and increased survival rates following stroke, trauma and cancer. This growing need is reflected in public policy commitments across all four UK countries.

0.5 We would be happy to provide additional information to the MAC if required.

## 1. Physiotherapy is a skilled profession

### Registered physiotherapists

1.1 Physiotherapists are autonomous clinical practitioners, able to independently assess, diagnose, advise, treat and prescribe medicines. To practice as a physiotherapist in the UK a practitioner must be registered with the HCPC. A recognised UK BSc or MSc in physiotherapy qualifies someone for registration. Physiotherapy as a registered profession is therefore at a level to qualify for the list.

1.2 Overseas trained physiotherapists, including those from Ireland and the rest of the EEA, can only join the register if their levels of education match UK standards. This is judged on a case by case basis by the HCPC.

### Unregistered physiotherapy support workers

1.3 Physiotherapy support workers are often working at NHS Band 4, which is only just below the registered clinician grading. In some cases expert support workers are on higher grades. We would therefore contend that therapy support workers with QRF level 3 or above qualifications should also be considered skilled workers and be added to the shortage occupation list.

1.4 Whilst there is no standard educational requirement for physiotherapy support workers across the UK, our research suggests that in all UK countries except Scotland<sup>1</sup> the majority of physiotherapy support workers hold at least a level 3 qualification.

## **2. There is a shortage of physiotherapists and demand is growing**

### NHS vacancy rates

2.1 We face a serious and immediate shortage of physiotherapists in the UK. Around 70% of registered physios work directly for the NHS. NHS national vacancy rates vary between 6% and 20%, with some services reporting higher rates<sup>2</sup>. Private and charitable services also report problems recruiting.

2.2 The CSP developed a labour force model which suggested the level of staffing required, across all sectors, in each NHS commissioning or planning area<sup>3</sup>. This suggested that the number of newly qualified physios coming out of UK universities would need to grow by 500 pa each year for multiple years to keep pace with demand (see table below).

2.3 Since then, policies in each UK country have added to NHS demand, in particular with the introduction of first contact physiotherapy in primary care in all four UK countries and elements relating to women's health, respiratory care and rehabilitation within the English Long Term Plan. Emerging long term rehabilitation needs of Covid survivors will further add to this demand.

### Physiotherapy support workers

2.4 Support workers might be seen as an alternative way of meeting demand. However, we believe there is a significant unmet demand for therapy support staff in their own right. Physiotherapy support workers operate under a range of job titles. They have a high level of responsibility; monitoring, advising and supporting the rehabilitation of patients. They allow registered staff to focus on the higher level elements of their roles.

2.5 In order to meet planned service developments under the English NHS Long Term Plan the number of physiotherapy support workers needs to increase to approximately 35% of the number of registered practitioners. This is in line with workforce proportions in nursing. This would need a trebling of the current 6,000 NHS physio support workers.

2.6 There is a need to increase the numbers of support workers with the capabilities required for higher level support worker roles at NHS Band 4 level (including Assistant Practitioner). As well as operating at a greater level of independence, higher level support worker roles will be important in reviewing competence of other support workers and supporting the need to increase capacity for practice based learning. In England this includes the introduction of the Health T level from 2021.

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<sup>1</sup> 43% in Scotland data from CSP Associates Survey 2019

<sup>2</sup> Northern Ireland 19.8% (Vacancies/WTE - HSC workforce census 2019 & HCS vacancies Sept 2019). England NHS 7.8% (ESR data, vacancy rates for 2017/18), Scottish NHS 6% (Scottish Workforce Information Standard System (SWISS) September 2019).

<sup>3</sup> CCG areas for England, Boards for Scotland, Wales and Northern Ireland.

## Overseas workforce

2.7 14% of currently registered physiotherapists are believed to have qualified outside the UK. Around 500 more overseas-qualified physiotherapists apply for HCPC registration each year. In addition, there is an unknown proportion of the workforce which qualified in the UK, but who are foreign nationals<sup>4</sup>.

2.8 Data on support workers is more limited. We believe that the numbers from overseas are in line with general health service trends.

### **3. Shortages are unlikely to be met from domestic supply alone**

3.1 Unlike some professions, physiotherapy remains popular as a career choice. Courses have been oversubscribed, drop out rates low and conversion rates high. However, there are barriers to expanding numbers due to; failures of public policy implementation in Scotland and Northern Ireland, the capacity of universities across all four UK countries and the capacity of health services in all nations to provide the practice based clinical training which is integral to UK degree programmes.

3.2 Table 3.3 below<sup>5</sup> shows our estimate for the level of deficit in newly qualified physios over the last five years. This uses our 2015/16 target of 2,726 graduates pa to meet the then modelled demand. That modelling drove our work to expand UK pre registration training numbers. We have now added the additional student numbers needed from 2019/20 to 2024/25 to meet growth in the NHS England Long Term Plan. This is likely to overstate supply and underestimate demand as we have not allowed for overseas students who never practice in the UK nor areas of growth where no figures have been set yet. This also assumes that current EEA and overseas staff remain in the UK workforce.

3.3 Table: UK student supply chain and service demand mismatch:

	2015/16	2016/17	2017/18	2018/19	2019/20
Pre registration students enrolling	2226	2335	2450	3064	3442
Estimated excess or (shortfall) at graduation v CSP model target	(500)	(391)	(276)	338	716
New public policy demands in England <sup>6</sup>	-	-	-	-	(1,308)
Cumulative shortfall	(500)	(891)	(1,167)	(829)	(1,421)

<sup>4</sup> Exact data on foreign nationals who practice in the UK is not available as; the Home office does not separately record visas issued to physios and the regulator does not provide nationality data. Overseas qualification, overseas student status and estimates based on CSP membership are therefore the best available data.

<sup>5</sup> Figures provided to the CSP by HEIs and subject to variation.

<sup>6</sup> Based on backfill for 80% of 5050 FCPs envisaged in long term plan and 50% of lung taskforce target, both over five years.

3.4 Covid is likely to act as a brake on UK supply for the next few years. Physiotherapy education involves a minimum of 1,000 hours of practice based learning in services. Clearly this is not currently possible and a backlog of placements is building up affecting most current students. Some will graduate later than expected as a result. Meeting the backlog is also likely to impact on how many new students HEIs can take in 2020/21 and possibly 2021/22.

3.5 Degree level apprenticeships may help to increase domestic supply. However, these have also been severely disrupted by Covid and are, in any case, in their early stages of development with fewer than 40 apprentices recruited so far.

3.6 The CSP remains committed to promoting domestic supply as the primary means of meeting growing workforce demand. However, we need the ability to recruit overseas physios and support workers as well for the foreseeable future.

#### **4. Political support**

4.1 Although political views are not part of the MAC's basis for advising the Home Office, we do believe that it is relevant to note that there is likely to be political support within Government for including physios in the list.

4.2 On 8 November 2019, on the BBC Radio Four Today Programme, the Home Office Minister Victoria Atkins MP was asked if the proposed NHS Visa would cover physiotherapists. She stated categorically that it would.

4.3 In 2014, Boris Johnson said voters were "totally fed up" with politicians' promises to cap migration while overseeing a system that tells "Australian physiotherapists" to "push off".

4.4 We were therefore expecting the Government to make provision for physiotherapy in the new immigration system. Adding physiotherapists and physiotherapy support workers to the list would help achieve the Government's commitments.

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