

Introduction

On January 19th 2016, the NMC changed its English language requirements for nurses trained in the EEA. All new registrants now need to score 7.0 in the international IELTS Academic English language test.

This was a controversial choice in the eyes of many at the time, and the ensuing year has already witnessed the considerable impact of this decision on overseas recruitment at a time of significant nursing shortages.

We spoke directly to different NHS Trusts and Health Boards from around the UK to get their insight on the effect the rule change is having on overseas recruitment, what they are doing to deal with any challenges it presents, and how this maps against the wider context of nursing in the UK.

Who We Spoke To

We interviewed several senior workforce, education and organisation development professionals working in 9 NHS Trusts and 1 Welsh Health Board (collectively referred to as 'the Trusts' for sake of convenience), representing a wide variety of approaches to international recruitment.

Aneurin Bevan University Health Board Doncaster and Bass

Barts Health NHS Trust M

Berkshire Healthcare NHS Foundation Trust

Cumbria Partnership NHS Foundation Trust

Derby Teaching Hospital NHS Foundation Trust

Doncaster and Bassetlaw NHS Foundation Trust

Medway NHS Foundation Trust

Mid-Cheshire Hospitals NHS Foundation Trust

Sussex Partnership NHS Foundation Trust

An NHS Trust employing over 5,000 staff in the home counties who preferred to remain anonymous

The paper also takes into account the extensive conversations SLC has had with international healthcare recruitment companies, private healthcare organisations and other NHS Trusts who use our language services for their international nurses, both Clinical English and IELTS preparation.



 There was very little participation in the NMC consultation on language assessment for EEA-trained nurses from NHS Trusts, which took place in summer 2015.

2. At the time of this consultation, there was very little understanding of what IELTS consists of and what candidates need to do in order to score 7.0 in the 4 papers, and this persists to a large degree today.

- 3. There is virtually no awareness of alternatives used in other English-speaking countries to assess the English level of nurses, including tests focusing specifically on the language skills used by nurses in practice.
- **4.** IELTS is reducing numbers of both EEA-trained and non-EEA-trained nurses significantly and causing long delays in international recruitment.
- **5.** IELTS is seen by some in a positive light as it ensures that overseas nurses have an advanced level of English that can then be adapted to a clinical setting.
- **6.** Only a small number of Trusts are currently providing formal support to overseas nurses to help them achieve IELTS 7.0.
- 7. Overseas recruitment remains vital given the challenges Trusts face recruiting and retaining UK-trained nurses, but is very unpredictable, especially in light of Brexit.

It seems clear to us that any Trust engaging in overseas recruitment needs to:

- a. acquire a much better understanding of the test, and considering this;
- **b.** take a much more thought-out, systematic approach to training and supporting nurses to score 7.0 in IELTS

It also seems clear that at a higher level, the NMC needs to further review its choice of test to ensure that any language assessment and training truly achieves its aim of ensuring safe and effective practice from overseas nurses.



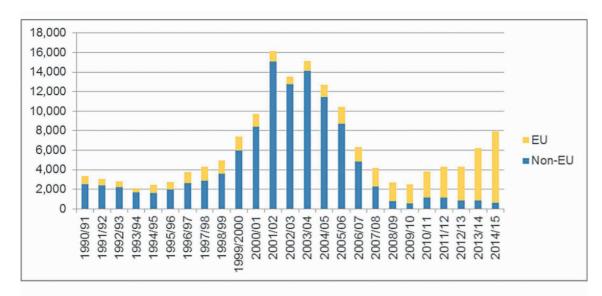
PART ONE: RESEARCH BACKGROUND

This section looks at the background to the decision to introduce IELTS, what the exam tests, the level required and the time required by most nurses to achieve that level.

International Recruitment of Nurses to the NHS

Overseas nurses have worked in the NHS in their thousands for many years.

The OECD put the proportion of foreign-born nurses in the UK in total employment at 22% in 2011, up from 15% in 2001. In 2014-15, 8,000 foreign-born nurses were recruited, mainly from the EEA. This reflects the shift away from recruiting from non-EEA countries – in particular India and the Philippines – and towards the EEA since 2007.



Source: Marangozov R, Williams M and Buchan J (2016), The labour market for nurses in the UK and its relationship to the demand for, and supply of, international nurses in the NHS

Overseas nurses continue to be an essential element of the NHS workforce, especially given the higher demand for nurses, a lower UK supply, and an uncertain future for nursing in the UK.

1. Higher Demand for Nurses

- · Higher nurse-to-patient ratios following the recommendations of the Francis Report2.
- From 2012 to 2032 the populations of 65-84 year olds and the over 85s are set to increase by 39% and 106% respectively3 with increasing pressure on health services.
- Since 2010 there are 31% more hospital admissions, 45% more procedures and 22% more patients in A&E.4

2. Lower UK Supply of Nurses

- The government decided to cut training places in England by more than 17%, some 5,000 places, between 2009/10 and 2012/13.5
- The proportion of the nursing workforce over the age of 45 now stands at around 45%6, and there is a noticeable spike in retirements at 55, the earliest age at which a nurse can retire on full NHS pension benefits.7



3. An Uncertain Future for UK Nursing

- · The replacement of government bursaries with student loans for nursing degrees means numbers of UK-trained nurses entering the health service from 2019 are unpredictable. Early indications show applications for nursing degrees in 2017 are down by 20%, and that the government figure of an additional 10,000 nurses may be optimistic.8
- · With regard to the government commitment to a seven-day NHS, the Department of Health recently stated: "The nursing workforce is expected to be put under additional pressure as seven day care is rolled out across the NHS with staff numbers, shift patterns and rostering requiring planning in advance"9
- 2 https://www.nice.org.uk/guidance/sg1
- 3 https://www.kingsfund.org.uk/time-to-think-differently/trends/demography/ageing-population
- 4 https://www.theguardian.com/commentisfree/2016/oct/24/nurses-brexit-cuts-eu-staff-nhs-crisis
- 5 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510630/Partial_review_of_the_shortage_occupation list - review of nursing.pdf
- 6 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/535657/The_labour_market_for_nurses_in_the_UK.pdf
- 7 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510630/Partial_review_of_the_shortage_occupation_ list - review of nursing.pdf
- 8 https://www.nursingtimes.net/news/education/universities-warn-of-drop-in-applicants-for-nursing-courses/7014339.article
- 9 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510630/Partial_review_of_the_shortage_occupation_ list - review of nursing.pdf

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510630/Partial_review_of_the_shortage_occupation_ list - review of nursing.pdf

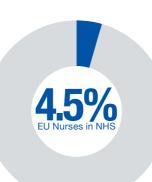
A combination of these factors, together with on-going pay caps and cuts in post-registration specialist training was recently called a 'perfect storm' in an article in the *Guardian*.¹⁰

According the Department of Health, there are significant nursing shortages, as cited in the Migration Advisory Committee report in March 2016:

"The overall nursing vacancy rate in the NHS was found to be 10% by NHS Employers... from 7% in Health Education North East, Health Education North West and Health Education South West, to 18% in Health Education North Central and East London and Health Education South London... These figures are all higher than the NICE recommended maximum vacancy rate for nursing of 5%."

In this context, recruiting internationally must be a central part of any short-term solution. A recent Institute of Employment Studies report stated:

"The NHS is increasingly reliant on the recruitment pipeline of nurses from Europe. Indeed EU nurses currently make up 4.5% of the total nursing workforce in England... up from just over 1% in 2009"¹²



But Can They Speak English?

A number of complaints brought against overseas nurses in recent years relate specifically to a lack of English skills compromising patient safety. While these represent a tiny percentage of the thousands of nurses working in the UK, one might argue that any risk to patient safety, no matter how small, is unacceptable.

In 2014, the National Nursing Research Unit highlighted that while European nurses felt they had reasonable English language skills, they were less confident that they had the 'right' language skills to work in the health service.¹⁴

This is supported by anecdotal evidence, including from two of the Trusts interviewed for this paper.

"I would say that the nurses that we recruited 3 years ago from Europe.. struggled far more in terms of their integration into working in the clinical environment"

"When the Europeans applied... they did have an English test in interview... we got the impression they were primed for the questions that we were asking, but when it came to asking questions outside of those, they found that quite difficult... So I believe some of them really shouldn't have been approved. We've had quite a lot of issues with them."

Public awareness of the potential issue was raised by a number of newspaper articles¹⁵ in the popular press and even in the run up to the 2015 general election¹⁶.

¹⁰ https://www.theguardian.com/commentisfree/2016/oct/24/nurses-brexit-cuts-eu-staff-nhs-crisis

^{11 &}lt;a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510630/Partial_review_of_the_shortage_occupation_list_-review_of_nursing.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510630/Partial_review_of_the_shortage_occupation_list_-review_of_nursing.pdf

^{12 &#}x27;Beyond Brexit: Assessing key risks to the nursing workforce in England', Institute for Employment Studies 2016

¹³ https://www.nmc.org.uk

¹⁴ http://www.kcl.ac.uk/nursing/research/nnru/policy/By-Issue-Number/Policy--Issue-42.pdf

¹⁵ http://www.dailymail.co.uk/news/article-2853527/Come-NHS-nurse-don-t-need-speak-English-II-twice-pay-half-hours-hospitals-tell-foreign-health-workers.html

http://www.dailymail.co.uk/news/article-2735170/Number-EU-nurses-UK-hospitals-doubles-four-years-Fears-patients-risk-language-problems.html

http://www.express.co.uk/news/uk/167403/NHS-is-forced-to-teach-foreign-nurses-English

¹⁶ https://www.theguardian.com/uk-news/2015/apr/18/new-immigrants-must-speak-english-says-miliband http://www.express.co.uk/news/politics/550180/Nigel-Farage-Ukip-NHS-foreign-doctors-nurses-English



Ensuring Safe and Effective Practice: Introducing the Academic IELTS Test

Following a consultation¹⁷ in summer 2015, the NMC announced that from January 19th 2016, all nurses registering in the UK would need to demonstrate a high level of English to ensure safe and effective care. This is set as either:

- A score of 7.0 in each of the 4 papers Reading, Listening, Writing and Speaking in the Academic version of the international IELTS English test within the previous 2 years.
- · Registration and a minimum 2 years' practice in an English-speaking country
- A nursing degree which was taught and examined in English

In practice, this means that the vast majority of European nurses registering to work in the UK as a nurse now need to sit the IELTS test.

The requirement was modified slightly in June 2016 so nurses could score 7.0 in the 4 papers in 2 tests taken within 6 months of each other, provided they scored a minimum of 6.5 in all papers in both sittings.

While IELTS is unfamiliar to most in the NHS, many experts in the English Language Teaching industry who work extensively with IELTS felt this would have a deep impact on the ability of the UK health service to recruit nurses from Europe.



What is IELTS?

The IELTS test was developed in the late 1980s. It is an academic English test originally designed for students who wish to study in English-speaking universities at either degree or postgraduate level. The language covered includes academic articles, lectures, seminars, and discursive essays. This is still its primary use. The test is now used by some professional bodies, such as the GMC and NMC. However, it does not test clinical language skills.

Basic user		Independent user		Proficient user	
A 1	A2	В1	B2	C1	C2
		4 4.5 5	IEL 5.5 6 6.5		3 9

The score of 7.0 required by nurses is high. It is equivalent to the level expected of a second year Modern Languages undergraduate in the UK.¹⁸ It is also the level of English required by overseas students to study at Oxford¹⁹ or Harvard University²⁰.

How Long does it Take to Improve an IELTS Score?

The CEO of International House London, Europe's largest IELTS test centre, suggested the following:

"Assessments of how many study hours it takes to go up a half band score or a full band score vary quite considerably – from 200 hours for a 0.5 band score improvement to 200 hours for a full band score improvement. One observation is that it takes more study hours to progress a band score the higher the level. There is no such thing as "the average student", but assuming candidates have experience of the test format, are motivated and have good learning habits I think the following is a good guide. 4.0 to 5.0 (around 200 hours); 5.0 to 6.0 (250+ hours); 6.0 to 7.0 (300+ hours)"

When tested, most nurses that we work with benchmark at around 5.0 in IELTS. This implies they need 550 hours or more of study in order to achieve the level set by the NMC.

¹⁷ https://www.nmc.org.uk/globalassets/sitedocuments/consultations/2015/consultation-on-english-language-requirements-and-process-for-registration-with-the-nmc---final.pdf

¹⁸ http://www.sussex.ac.uk/languages/ml/ug/electives/levels

 $^{19 \ \}underline{\text{https://www.ox.ac.uk/admissions/undergraduate/international-students/english-language-requirements}}$

²⁰ https://www.extension.harvard.edu/tuition-enrollment/course-registration/english-proficiency-requirement-registration

PART TWO: RESEARCH REPORT

In this section, we report on the interviews we conducted with the NHS Trusts listed when researching this White Paper.

1. Participation in the NMC Consultation on English Language Requirements for EEA-trained nurses

Of the 10 organisations we spoke to, only one had definitely responded to the NMC consultation. All other NHS Trusts either did not know if their organisation had contributed or knew they had not.

This is in line with the general level of response reported by the NMC, which stated that only 18 NHS employers and 11 independent sector employers or employment agencies contributed²¹. The majority of respondents, 425 out of 723, were in fact individual nurses or midwives based in the UK.

2. Understanding of what the IELTS Test Consists of - Content and Level

There was an overall sense among interviewees that they were not aware of IELTS, its contents, and the demands of a level 7.0 in the 4 papers at the time of the consultation, and it is only now that this is beginning to change.

"To be honest with you, we weren't fully informed about the IELTS. We've only started to really get proper clarification about how it will affect [recruitment]."

For most interviewees, their understanding of IELTS did not go beyond that the test was difficult and required a high level of English.

"I have had a quick look at it. It is a very high standard"

"I've only looked at it and thought, 'Ooh that's quite difficult!""

"I've never actually seen the IELTS paper itself... But a colleague I know has and she says it's so hard"

Only 2 interviewees demonstrated in-depth knowledge of the test at the time we spoke to them, and both expressed surprise that the level has been set so high. Of these, one was working at an international university in Saudi Arabia at the time of the consultation:

"I have spent a number of years working in Saudi Arabia and, for the Post Graduate students and Faculty members, we were looking for IELTS of 6.5, and these are people who teach PhD students, in English, in Science, Maths and Engineering. It was quite astonishing to me that there was such a stiff requirement across the board, as I say, in all four categories."



The other, a senior workforce director at the Trust which requested anonymity, commented that he has since taken the test to see why so many international candidates were taking so long or failing to achieve 7.0. Subsequently, he stated that 7.0 was "unrealistically high", especially given its focus on academic subjects such as the rainforest and invader ants or character creation in theatre productions, which were of little relevance to nurses.

3. Alternatives to IELTS

The Consultation Report from the NMC stated that some respondents had disagreed with the choice of IELTS and suggested alternatives. Of the 37% who disagreed with the choice of IELTS, the report stated:

The majority of the **opposition** related to the use of IELTS as our choice of test. This was questioned on grounds that IELTS only evaluates an individual's academic knowledge of English and does not necessarily give an indication of competence in a clinical context. A number of respondents made specific reference to alternative tests which may provide the assurance that we require – such as the Canadian English Language Benchmark Assessment for Nurses (CELBAN) and the nursing version of the Occupational English Test (OET), among others. Several respondents went further to suggest that we should develop our own language assessment.²²

However, none of the interviewees we spoke to had heard of the CELBAN²³ or OET²⁴ tests for nurses, even though they are widely used in Canada, Australia, New Zealand and Singapore.

"There isn't any alternative to the IELTS. Well, I say that there's no alternative to the IELTS; I'm assuming there's no alternative, because looking through NMC documentation, it doesn't mention anything else."

4. The Impact of IELTS on the Recruitment of EEA-trained Nurses

There was general agreement that because IELTS was a difficult test, recruitment from the EU would be delayed and most probably fall to lower levels than in recent years.

"What we've found is that we're able to hire, from Europe, extremely competent clinical staff, who are very good at their job, that we're simply not able to hire because they're not able to get themselves through the IELTS papers."

^{21 &}lt;a href="https://www.nmc.org.uk/globalassets/sitedocuments/consultations/2015/final-version-english-language-requirements-consultation-summary-of-responses.pdf">https://www.nmc.org.uk/globalassets/sitedocuments/consultations/2015/final-version-english-language-requirements-consultation-summary-of-responses.pdf

²² https://www.nmc.org.uk/globalassets/sitedocuments/councilpapersanddocuments/council-2015/council-papers-8-october.pdf

²³ http://www.celbancentre.ca/

²⁴ https://www.occupationalenglishtest.org/



"...and the reason why we don't recruit further afield is not because of the skills, because the skills are absolutely amazing, but it's because of IELTS. It's the IELTS level 7 that people really can't seem to pass. So, that's the biggest challenge for us."

"We've had far fewer European nurses – it's really tailed off – and that's been something that been reported across London."

It was also felt that the number of qualified nurses from the EU already with IELTS 7.0 is very low.

"We try to find nurses that have already got an IELTS Certificate; obviously that significantly narrows our pool of candidates, and it becomes then increasingly difficult, especially if you are looking for specialist nurses; it's a small pool anyway, so you're looking for a particular specialism with the added bonus of having an IELTS qualification, then you're fishing then in a very, very small pool."

A recent report from the Institute of Employment Studies which also interviewed NHS Trusts highlighted the same concern:

All trusts anticipated that this would significantly reduce the numbers of potential recruits from the EEA, if not diminish them altogether. One trust went as far as to suggest the new IELTS exam would almost remove Europe as a viable alternative for them to recruit any new nurses, saying:

"I don't think anyone will go to Europe anymore after these [exams] are introduced because it will yield even fewer potential recruits. This will mean that the time and expense of European recruitment will be the same or even greater than foreign recruitment."²⁵

5. IELTS and Recruiting Non-EEA trained Nurses as an Alternative

Around the same time that the new language assessment was announced, nurses were added to the Shortage Occupation List. This allows Trusts to recruit extensively from traditional overseas markets such as the Philippines and India, so potentially mitigating against falling numbers from Europe.

However, despite having a good level of English, the majority of these overseas nurses struggle to score 7.0 in IELTS. One Workforce Director commented that it was taking their Filipino candidates with a general level of English of 6.5 a further 4 to 5 months' study to achieve 7.0. Most people we spoke to said that numbers coming across in practice have been much lower than anticipated.

"I've spoken to colleagues in different organisations who've done overseas interviews and they've appointed up to 84 individuals, but then at the end of the day they've had 4 people start because of not meeting level 7."

(Discussing the interviewee's Trust having offered 65 places to nurses) "Back in December (2015) they (the Trust) went out to the Philippines and none of these nurses have arrived yet, and we don't anticipate them arriving any time soon"

"We've got people we recruited years ago still trying to pass their IELTS!"

When one refers back to the table on recruitment from non-EEA and EEA countries, one sees that when IELTS was introduced for non-EEA nurses in 2007, overseas recruitment moved towards the EU where nurses could work in the UK under European agreements on travel and work.

However, now all international nurses need to take IELTS, it seems clear that recruiting internationally has become increasingly challenging, expensive and unpredictable.

6. Providing Support for IELTS

Only 2 Trusts we spoke to had measures in place to help EEA-trained nurses prepare for the IELTS test

"We're looking at perhaps getting them started as an associate practitioner while they complete their IELTS. It's at early stages, but with more and more nurses coming from abroad, we're going to need to push for it, for support to be in place."

"We have face-to-face courses here in our Learning Centre, and we also offer online training packages as well. But, I have to say that we have found it far more cost effective to look for English ability in the recruitment process, so that before they even get here, we would be looking for candidates have proof of their standard of English."

Of the other Trusts, some were expecting nurses to already have IELTS 7.0 before applying, while others were either providing English support to non-EEA overseas nurses such as in the Philippines, no longer looking to the EU as a recruitment market, or were just beginning to come to terms with the new circumstances.

²⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/535657/The_labour_market_for_nurses_in_the_UK.pdf

7. International Recruitment - Is There a Choice?

Trusts are clearly all looking at every way possible to recruit nurses.

UK recruitment focuses on what might be termed traditional methods, so student placements, return-to-practice promotions, university job fairs, social media, job advertising, referrals and recruitment companies. Some said they were also developing HCAs into Assistant Practitioners and would be working with apprentice nurses from 2017. All agreed that recruiting sufficient UK-trained nurses was a huge challenge.

Overseas recruitment - which has been a lifeline for many Trusts for many years - is arguably under threat, but is still seen as an important part of the overall recruitment picture. Even those with very small numbers of overseas nurses were considering going overseas, either to Europe or further afield, as the UK market was very stretched.

"...they (the Trust) were talking that they might like to do something in the EU, because we can't keep carrying on as we are"

A number of Trusts mentioned different ways of bolstering overseas numbers, such as training international HCAs with nursing qualifications to achieve 7.0 at IELTS and working with universities who provide a top up degree for overseas nurses. However, it was agreed that these alone would not fix the significant recruitment challenges facing all the Trusts we spoke to.

So, at least in the short-term (and in most people's eyes, in the longer term), international recruitment is essential to plugging staffing gaps and providing the high standards of care expected across the NHS.



Conclusions and Recommendations

It seems clear that NHS Trusts looking to recruit from overseas markets have a lot of learning to do around the IELTS test so they truly understand the challenges they and their candidates face. This learning will be invaluable when managing the recruitment process – who to recruit, the timelines and costs involved, and the training that needs to be done. It will also be of great help to Trusts in any conversations they have with the NMC on what the most effective assessment is to be confident that international nurses' English will ensure safe and effective practice.

Our full findings are listed on page 3.

Recommendations

- 1. Trusts should build their awareness of the test, what it consists of, what level is required to achieve 7.0, what skills candidates need to develop to score 7.0, and how they can acquire those skills.
- 2. Due to its difficulty, there are very few nurses who can score 7.0 without considerable work on language awareness, test strategies and techniques. Trusts should therefore systematically adopt IELTS training programmes for nurses under offer, to be delivered by experienced IELTS teachers and examiners (not General English teachers) and under the direction of an organisation aware of the time and budget constraints experienced by NHS Trusts.
- 3. If 'safe and effective' practice is the key outcome of language testing, then we recommend that the IELTS test be either supplemented or replaced by a test that focuses explicitly on the language used by nurses at work. Rather than writing an academic essay, for example, nurses should be required to write a handover or case notes.
- 4. The NMC should therefore review the language assessment regime as promised in the original consultation report of October 2015, with fresh input from Trusts affected as well as English Language training organisations with experience of working with overseas nurses. Such a review would work towards providing an assessment that enables international nurses to focus on learning the language they need to truly provide the excellent levels of care expected of them by patients, colleagues and employers.



About Specialist Language Courses (SLC)

Based at the University of Sussex, SLC is a leading expert in online technical, academic and business language training. SLC works extensively with the medical sector, providing ground-breaking online Clinical English courses for doctors, nurses, healthcare assistants and carers, as well as multiple IELTS Preparation Programmes to international doctors and nurses relocating to English-speaking countries. SLC offers self-study and blended courses, using virtual instructor-led lessons. SLC's healthcare client list includes NHS Trusts, international healthcare recruitment companies, private hospitals and care home groups.







Chris Moore is Managing Director of SLC. Chris graduated from Cambridge University in 1989 and then spent 21 years as English teacher, teacher trainer, school principal, academic director and course designer before founding SLC in 2012.

