

Higher education student finance for the 2023 to 2024 academic year

Equality Impact Assessment

February 2023

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Introduction

Under the Equality Act 2010, the Department for Education (DfE), as a public authority, is legally obliged to give due regard to equality issues when making policy decisions – the public sector equality duty, also called the general equality duty.

One means of meeting this requirement is to carry out an Equality Analysis which helps us understand the potential impact of new policy proposals and regulations on people from different groups in society and whether some are likely to be affected more than others.

DfE as a public authority, must in the exercise of its functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons with protected characteristics;
- Take steps to meet the needs of persons who share a relevant protected characteristic; and
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons it disproportionately low.

The general equality duty covers the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

To date we are yet to find evidence to suggest that the characteristics of gender reassignment, pregnancy and maternity and sexual orientation have an impact of the likelihood of a student to receive certain student support products beyond the assumption that pregnant females or mothers would be more likely to receive or go on to receive certain targeted grants designed to support those with dependants or childcare. There is also no robust data collected on religion or belief at undergraduate

level and so there are limitations in assessing the effect of policy changes for 2023/24 on different religious groups.

As disadvantage in education is still apparent in connection to family income and economic status we will also consider the impact on individuals from lower income groups. We will use the terms protected and disadvantaged groups as well as protected characteristics. Protected groups are a reference to people with protected characteristics, and disadvantaged groups refer to low income groups with low participation rates more widely.

Any queries or comments about this Equality Analysis should be addressed to: Linda Brennan, Department for Education, Great Smith Street, London, SW1P 3BT, linda.brennan@education.gov.uk

Summary

Changes to the student finance system

A number of policy proposals considered in this equality analysis concern changes to student finance arrangements for the 2023/24 academic year with maximum loans and grants for living and other costs and postgraduate loans uplifted by 2.8%.

- Increases in grants that act as a contribution towards the cost of living for students starting full-time undergraduate courses before 1 September 2016 by 2.8%.
- Increases in dependants' grants for full-time undergraduate courses by 2.8%.
- Increases in loans for living costs for undergraduate courses by 2.8%.
- Increases in disabled students allowance for full-time and part-time undergraduate and postgraduate courses by 2.8%.
- Increases in loans for students starting postgraduate master's degree courses and doctoral degree courses in 2023/24 by 2.8%.

Our overall assessment is that these proposed changes will overall have a negative impact for students with and without protected characteristics. This is because a 13.7% increase would be required to maintain the value of loans and grants for living and other costs in real terms using the 2020/21 academic year as a baseline, as measured by CPI¹, due to the recent spike in inflation. Therefore a 2.8%² increase in maximum support for 2023/24 will not restore the erosion in purchasing power since 2020/21 and is unlikely to prevent a further erosion in purchasing power by the start of the 2023/24 academic year.

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¹ Consumer Prices Index

² Forecast RPIX for the first quarter of 2024 set out in table 1.7 of the Supplementary Economy Tables published by the Office for Budget Responsibility as part of their Economic and Fiscal Outlook on 17 November 2022 alongside the Autumn Statement. https://obr.uk/efo/economic-and-fiscal-outlook-november-2022/

Proposed changes to loans, grants and allowances in 2023/24

Support for Undergraduate Courses

Loans for living costs for new full-time students and continuing full-time students starting their courses on or after 1 August 2016

- Maximum loans for living costs for new full-time undergraduate students and eligible continuing full-time undergraduate students starting their courses on or after 1 August 2016 will be increased by 2.8% in 2023/24.
- For students living away from home and studying outside London, the
 maximum loan for living costs for 2023/24 will be £9,978. The equivalent loan
 rate for students living away from home and studying in London will be £13,022,
 for those living in the parental home during their studies, £8,400 and for those
 studying overseas as part of their UK course, £11,427.

Loans for living costs for new full-time students and continuing fulltime students starting their courses on or after 1 August 2016 who are entitled to certain benefits

- Maximum loans for living costs for new full-time undergraduate students and eligible continuing full-time undergraduate students starting their courses on or after 1 August 2016 and who are eligible for benefits will be increased by 2.8% in 2023/24.
- For undergraduate students who are entitled to benefits who are living away from home and studying outside London, the maximum loan for living costs for 2023/24 will be £11,374. The equivalent loan rate for students who qualify for benefits and who are living away from home and studying in London will be £14,202; for those living in the parental home during their studies, £9,910; and for those studying overseas as part of their UK course, £12,720.

Loans for living costs for new full-time students and continuing full-time students starting their courses on or after 1 August 2016 who are aged 60 or over at the start of their course

 The maximum loan for living costs in 2023/24 for new full-time undergraduate students and eligible continuing full-time undergraduate students starting their courses on or after 1 August 2016 who are aged 60 or over on the first day of the first academic year of their course, will be increased by 2.8% to £4,221.

Maintenance Grants and Special Support Grants for full-time students who started their courses before 1 August 2016

 The maximum maintenance grant and special support grant for eligible continuing full-time undergraduate students who started their courses on or after 1 September 2012 but before 1 August 2016, will be increased by 2.8% in 2023/24 to £4,121.

Loans for living costs for full-time students who started their courses before 1 August 2016

- Maximum loans for living costs for eligible undergraduate students, who started their course on or after 1 September 2012 but before 1 August 2016, will be increased by 2.8% in 2023/24.
- For students who are living away from home and studying outside London, the
 maximum loan for living costs will be £7,153. The equivalent loan rate for
 students living away from home and studying in London will be £9,980; for
 those living in the parental home during their studies, £5,689; and for those
 studying overseas as part of their UK course, £8,498.

Long Courses Loans

• Maximum long courses (living costs) loans for new and continuing undergraduate students who are attending full-time courses that are longer than 30 weeks and 3 days during the academic year will be increased by 2.8% in 2023/24. The maximum long courses loan will be £107 a week for students who are living away from home and studying outside London. The equivalent loan rate for students living away from home and studying in London will be £138 a week; for those living in the parental home during their studies, £71 a week; and for those studying overseas as part of their UK course, £148 a week.

Dependants' Grants

- Maximum amounts for dependants' grants (adult dependants' grant, childcare grant and parents' learning allowance) will be increased by 2.8% in 2023/24 for all new and continuing full-time undergraduate students.
- The maximum adult dependants' grant (ADG) payable in 2023/24 will be increased to £3,354. The maximum childcare grant (CCG) payable in 2023/24,

which covers 85% of actual childcare costs up to a specified limit, will be increased to £188.90 per week for one child and £323.85 per week for two or more children. The maximum parents' learning allowance (PLA) payable in 2023/24 will be increased to £1,915.

Disabled Students' Allowance

• The maximum disabled students' allowance (DSA) will be increased by 2.8% to £26,291 for new and continuing full-time and part-time undergraduate students in 2023/24.

Part-time loans for living costs

• The maximum loan for living costs in 2023/24 for new part-time undergraduate students starting degree level courses on or after 1 August 2018 will be £9,978 for students living away from home and studying outside London. The equivalent loan rate for students living away from home and studying in London will be £13,022; for those living in the parental home during their studies £8,400; and for those studying overseas as part of their UK course, £11,427. The amount of loan a part-time student qualifies for will, in addition to household income, depend on the intensity of study on the course when compared to a full-time course.

Support for Postgraduate Courses

Maximum loans for new students starting Postgraduate Courses in 2023/24

- Maximum loans for new students starting postgraduate master's degree courses in 2023/24 will increase by 2.8% to £12,167.
- Maximum loans for new students starting postgraduate doctoral degree courses in 2023/24 will be increased by 2.8% to £28,673.

Disabled Students' Allowance for Postgraduate Students

 The maximum disabled students' allowance will be increased by 2.8% to £26,291 for new and continuing full-time and part-time postgraduate students in 2023/24.

The rationale for student finance

Higher education represents a significant investment in both terms of time and money. While the costs of study, in the form of tuition fees and living expenses, are incurred up front, the benefits, in the form of higher lifetime earnings and improved health and well-being, do not materialise until later after the student has graduated.

Government intervention is needed because a private sector led credit market for student finance would not work: students would not be able to borrow, partially or fully, the money they need to cover the costs they incur during study and repay the lender once they have graduated and started earning an income.

As a result, the supply of higher education student finance which private lenders made available would be less than student demand. This in large part because students are unlikely to have collateral which they can offer lenders as security (human capital not being a physical asset) or sufficient liquidity to service loan repayments. Moreover, lenders do not have perfect information about the credit worthiness of students and their ability to repay the loan (which will be based on the student's employment and earnings outcomes after they graduate).³

In response, private capital markets lenders may seek to limit their exposure to the risk of non-repayment by student borrowers by either rationing the amount of credit they offer to students or charge even higher risk premia to cover the higher risk of lending (exacerbating even further the adverse selection problem).

As a result, finance would represent a barrier to participation. Only those students who would be able to fund the upfront costs of their studies through private means (e.g. personal savings or income or commercial borrowing) would be able to participate in higher education.

https://ifs.org.uk/sites/default/files/output_url_files/Lorraine%2520Deardren%2520-%2520The%2520complicated%2520issue%2520of%2520HE%2520finance.pdf

³ An overview of the different reasons for government intervention in the context of higher education student finance can be found here:

The case for annually uprating student support

Sustained increases in prices and the cost of living reduce the real value of money, in terms of the quantity of goods and services that a given amount of money will buy. The most widely used measure of inflation, the Consumer Price Index (CPI), was 10.7% in the twelve months to November 2022, although there was significant variation across the different categories of expenditure (see Table 1 below).

The student support package – the amount of support a student can receive from the Government towards living costs – is determined annually. For 2023/24, the package will be increased by the rate of forecast inflation of 2.8%, the forecast RPIX⁴ ⁵ figure for the first quarter of the 2024 calendar year which was published by the OBR as part of its macro-economic forecasts in November 2022.

Historically, increasing the maximum level of student support available across these different streams of funding in line with forecast inflation aims to ensure that students do not suffer a real reduction in their income.

However, due to the recent spike in inflation, the latest OBR figures for RPIX published in November 2022, show an outturn figure for the first quarter of 2022 of 8.5 % (compared to the 3.1% forecast figure used for increases to support in 2021/22) and a 12.1 % forecast figure for the first quarter of 2023 (compared to the 2.3% forecast figure used for increasing support in 2022/23). This means that increases in maximum loans and grants for 2021/22 and 2022/23 have not maintained their value in real terms.

Using the RPIX inflation index, uprating loans for living costs by 18.5% would capture the difference between uprating in academic years 2021/22 and 2022/23 and RPIX forecasts and outturns for the same period in addition to forecast 2.8% RPIX uprating for academic year 2023/24.

A 13.7% uplift in 2023/24 would be required to maintain the value of maximum loans and grants for living and other costs in real terms as measured by CPI using 2020/21 as the baseline.⁶

The Institute for Fiscal Studies (IFS) highlighted in its November 2022 report that

⁴ RPIX – Retail Price Index excluding mortgage interest.

⁵ Forecast and Outturn RPIX inflation figures are set out in table 1.7 of the Supplementary Economy Tables published by the Office for Budget Responsibility as part of their Economic and Fiscal Outlook on 17 November 2022 alongside the Autumn Statement. https://obr.uk/efo/economic-and-fiscal-outlook-november-2022/

⁶ Forecast and Outturn RPIX and CPI inflation figures are set out in table 1.7 of the Supplementary Economy Tables published by the Office for Budget Responsibility as part of their Economic and Fiscal Outlook on 17 November 2022 alongside the Autumn Statement. https://obr.uk/efo/economic-and-fiscal-outlook-november-2022/

because recent inflation is much higher than the OBR RPIX forecasts used as a basis for increasing loans for living costs, the value of loans has been reduced by more than £1,000 in real terms compared to 2020/21.⁷

A 2.8% increase to grants and loans for 2023/24 will likely lead to a further erosion of students' purchasing power and will not provide any catch up of the real terms losses already seen by students in the 2022/23 academic year due to high inflation. In 2022/23, half of students felt they had financial difficulties, with 35% saying these were minor and 15% saying they were major. § 25% of students had taken on new debt in response to the rising cost of living, including those who borrowed more or used more credit than usual; of these, 66% reported they did so because their student loan was not enough to support their living costs. § When asked to compare their financial situation with this time last year, half (51%) of students reported that their income had decreased a little or a lot. Only 21% of students reported that their income had increased in the same period.

As a result, many students, including from groups who share protected characteristics and from disadvantaged groups, will not be able to make the same spending decisions as they did previously with regards accommodation, travel, food, entertainment and course related items such as books and equipment, the costs of which will have been rising over time.

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⁷ Cost-of-living crisis to hit students harder than expected | Institute for Fiscal Studies (ifs.org.uk)

⁸ Cost of living and higher education students, England <u>Cost of living and higher education students, England - Office for National Statistics</u>

⁹ Cost of living and higher education students, England <u>Cost of living and higher education students, England</u> - Office for National Statistics

Table 1: CPI rate of inflation¹⁰ and by category of expenditure

	% change over 12 months (to November 2022)
CPI (Overall index)	10.7
01 Food and non-alcoholic beverages	16.4
02 Alcohol and tobacco	4.1
03 Clothing and footwear	7.5
04 Housing and household services ¹¹	26.6
05 Furniture and household goods	10.7
06 Health	4.8
07 Transport	7.2
08 Communication	2.6
09 Recreation and culture	5.3
10 Education	3.2
11 Restaurants and hotels	10.2
12 Miscellaneous goods and services	5.4

¹⁰ Consumer price inflation: November 2022 published by the Office for National Statistics. <u>Table 3</u>

¹¹ Includes water, gas, electricity and other fuels.

The protected characteristics of student support recipients

Table 2 below shows the protected characteristics profile of student support recipients for each product type. By comparing the profile of each product type against that of the undergraduate full-time loan for living costs claimant population, it is possible to determine the extent to which protected groups in each of the different product claimant populations are under, over or proportionately represented.

We use the undergraduate full-time loan for living costs student population as the basis for comparing the profile of protected characteristics of different product groups. This is because it has the largest number of claimants (tuition fees loans notwithstanding) which means it is more likely to representative of the whole student population. Provisional figures for academic year 2021/22, the number of English domiciled undergraduate full-time students receiving a loan for living costs (maintenance loan) was 1,141,649 ¹².

This analysis focuses on age, sex and disability. Ethnicity is not included because there are significant limitations on ethnicity data as reported by the SLC as students are not required to declare their ethnicity. This would mitigate the risk of a legal challenge on the basis that race was not properly considered.

Age

SLC data in table 2 below shows the percentage of young and mature students (defined as being 21 years of age or over at the start of their course) awarded different types of student support. The data shows that mature students are:

- Significantly over-represented in the part-time loan for living costs claimant population. This is likely to reflect the fact that mature students are more likely than younger students to study part-time because of their personal circumstances (e.g. family, work or financial commitments).
- Significantly over-represented in the postgraduate masters and doctoral loans populations, reflecting the fact that students are typically over the age of 21 when enrolling on these more advanced levels of study.
- Significantly over-represented in the maintenance and special support grant claimant populations and in the dependants related grant populations i.e.
 Adult Dependants' Grant (ADG), Childcare Grant (CCG) and Parents'

¹² Table 2A <u>Student support for higher education in England 2022 - GOV.UK</u> (www.gov.uk)

Learning Allowance (PLA). Maintenance and special support grants have been discontinued for new students from 2016/17 and only very few students are still receiving them.

 Significantly over-represented in the postgraduate and part-time undergraduate DSA claimant population. They are also over-represented in the travel element of full-time undergraduate DSA.

Sex

Table 2 below shows that there is less variation in the male/female profile across the different product claimant population compared to other protected characteristics. The key observations to note are:

- Female students are significantly over-represented in the population of childcare grant and parents' learning allowance claimant population while males are over-represented in the adult dependants' grant population.
- Female students are over-represented in the part-time loan for living costs claimant population. This is likely to reflect the fact that female students are more likely than male students to study part-time because of their personal circumstances (e.g. family commitments).
- Female students are over-represented in the full and part-time undergraduate DSA claimant population as well as the postgraduate DSA population.

Disability

SLC does not require a student to declare whether or not they have a disability, so students applying for DSA has been used as a proxy. However, we would expect this to be a sub-set of the total number of students with a disability because not all students with a disability need additional support funded by DSA on top of any reasonable adjustments provided by their institution. The data shows that:

- a) DSA recipients are significantly over-represented in the part-time loan for living costs population.
- b) DSA recipients are modestly over-represented in the full-time maintenance and special support grant population and also in the dependants related grant populations (ADG, CCG, and PLA).

Table 2: Protected characteristics profile of 2021/22 England domiciled borrowers by product

Made of Chidu	Dundrick Curry	76,145 100% 0.0% 29.9% 70.1% 48.8% 46,195 100% 0.0% 28.8% 71.2% 46.3% 32,900 100% 0.0% 30.0% 70.0% 54.7% 51,840 100% 0.0% 29.2% 70.8% 53.8% 4,620 100% 0.0% 27.6% 72.4% 33.6% 84,920 14.6% 85.4% 25.8% 74.2% 2.5% 22,445 10.6% 89.4% 52.1% 47.9% 0.6% 77,355 14.7% 85.3% 23.0% 77.0% 2.1% 37,810 16.9% 83.1% 15.7% 84.3% 2.6% 810 14.4% 85.6% 40.1% 59.9% 80.9% 88,480 6.1% 93.9% 32.2% 67.8% 6.9% 8,725 19.8% 80.2% 31.6% 68.4% 4.0% 0 0.0% 0.0% 0.0% 0.0% 0.0% 5	е					
Mode of Study	Product Group	Borrowers	Receiving DSA	Not Receiving DSA	Male	Female	Under 21	21+
	Full Time Maintenance Loans	1,141,650	6.8%	93.2%	41.8%	58.2%	56.0%	43.96%
	Full Time Tuition Fee Loans	1,166,325	6.7%	93.3%	42.0%	58.0%	58.3%	41.7%
	Full Time Maintenance and Special Support Grants	1,680	19.1%	80.9%	55.9%	44.1%	0.1%	99.9%
	Full Time Disabled Students Allowance (DSA)	76,145	100%	0.0%	29.9%	70.1%	48.8%	51.2%
	Non Medical Helper	46,195	100%	0.0%	28.8%	71.2%	46.3%	53.7%
	Equipment DSA	32,900		0.0%	30.0%	70.0%	54.7%	45.3%
	General DSA	51,840			29.2%		53.8%	46.2%
	Travel DSA				27.6%		33.6%	66.4%
	Other Targeted Support Awards							97.5%
	Adult Dependants Grant							99.4%
Undergraduate	Parental Learners Allowance							97.9%
Ondergraduate	Childcare Grant							97.4%
	Travel Grant	810			40.1%	59.9%	80.9%	19.1%
	Part Time Tuition Fee Loans							93.1%
	Part Time Maintenance Loans	8,725			31.6%		4.0%	96.0%
	Part Time Grants - Course Grant	0						0.0%
	Part Time Grants - Tuition Fee Grant							0.0%
	Part Time Disabled Students Allowance (DSA)							94.9%
	Non Medical Helper							96.1%
	Equipment DSA							95.0%
	General DSA							94.0%
	Travel DSA	150	100.0%	0.0%		73.8%		96.0%
	Post Graduate Masters Loans	91,270			37.1%	62.9%	0.2%	99.8%
	Post Graduate Doctoral Loans	9,225			45.0%	55.0%	0.01%	99.99%
Postgraduate	Post Graduate DSA	7,775	100.0%	0.0%	27.8%	72.2%	6.3%	93.7%
	Non Medical Helper							
	Equipment DSA							
	General DSA							
	Travel DSA							

Notes: Figures are for loans, grants and allowances paid by Funding Body England for the 2021/22 academic year as at 31st August 2022. Only England-domiciled borrowers are included (EU-domiciled students are excluded). Age is defined as at start of academic year 2021/22 (1st Sept 2021). Figures are for enrolled borrowers not just entrants.

Figures for part-time ADG and CCG claimants not reported as disclosive. Postgraduate DSA is only one product, unlike undergraduate DSAs before 2021/22 which is split into four products in the figures above, hence why only one postgraduate figure is reported.

Number of borrowers rounded to the nearest 5, x=below 3 suppressed to preserve confidentiality, ... =not available. Disaggregated figures do not always add up because of

missing data.

Analysis of Proposed Changes

A 2.8% increase to grants and loans for 2023/24 will not provide any catch up of the real terms losses already seen by students in the 2022/23 academic year due to high inflation and could lead to a further erosion of students' purchasing power depending on future inflation. More than 9 in 10 (91%) higher education students reported that their cost of living in 2022/23 had increased compared with last year, similar to adults in Great Britain (91%).¹³

It is anticipated that a 2.8% uplift in undergraduate loans for living costs as well as the postgraduate masters and doctoral loans will adversely impact all students.

Specific groups of students are adversely affected by the changes due to them being overrepresented in the loan borrowing population, and in the population receiving specific loan and grants products.

Female borrowers form a larger proportion of loan borrowers and grant recipients across all products (except for the full-time maintenance and special support grant) and would be negatively impacted by a 2.8% increase in loans for living costs. Loans of the same value will be increased by 2.8% irrespective of borrower's sex or other protected characteristics.

The higher proportion of female borrowers reflects the higher proportion (57% in 2021/22)¹⁴ of English-domiciled female undergraduate students compared to the general population (51% in 2021)¹⁵. As the grant recipients are more likely to be female¹⁶ and most (95%) grant recipients also receive loans for living cost support¹⁷, the female borrowers will be more adversely affected by decrease in real-term loss of value for both grants and loans.

More widely, females are more likely to be in HE than males (the HE initial participation (HEIP) measure for females aged 17 to 30 in academic year 2019/20 was 60.8%, compared to 46.3% for males ¹⁸) so the effect is greater for this group as a whole.

¹³ Cost of living and higher education students, England - Office for National Statistics

¹⁴ Figure 5 – HE student enrolments by personal characteristics all countries of study, all years of study, all undergraduate, all modes of study, England domiciled https://www.hesa.ac.uk/data-and-analysis/sb265/figure-5

¹⁵ Population and household estimates, England and Wales - Office for National Statistics (ons.gov.uk)

¹⁶ Table 2 - Protected characteristics profile of 2021/22 England domiciled borrowers by product, Student Loan Company

¹⁷ 95% of English-domiciled full-time undergraduate students receiving support grant in AY 2020/21 also received a maintenance loan, DfE analysis of Student Loans Company data

¹⁸ Participation measures in higher education statistics, 19/20

Mature students (above 21 years old) will be negatively impacted by a 2.8% increase in the loans for living costs for part-time undergraduate study and postgraduate loans. The higher proportion of older loan borrowers reflects higher proportion of these students in the population of part-time and post-graduate students. As the students receiving support grants tend to be older than the full-time maintenance loan borrowers, and most grant recipients also receive loans for living cost support, they would be more adversely affected by the real-term loss in value of both grants and loans.

Low-income groups of students would be adversely affected by the real term decrease in the value of the loan. In 2022/23, 63% of English-domiciled students relied on loans or grants to pay for their living costs ¹⁹ and 41% of those receiving loans for living costs in 2021/22 had household income low enough to qualify for the full-loan amount²⁰. However, in 2022 there was a record number of 18-year-olds getting into university, including those from disadvantaged backgrounds. An English 18-year-old from a disadvantaged background today is 86% more likely to go to university than in 2010.²¹

Students from minority ethnic backgrounds will be negatively impacted by a 2.8% increase in loans for living costs as they are over-represented across students in higher education. The proportion of Black and Asian English domiciled full-time undergraduate students in AY 2021/22 was 10% and 16%²² respectively which is higher than the general population²³. Black pupils have seen the greatest increase in the proportion entering HE by age 19 – from 44.1% in 2009/10 to 62.1% in 2020/21.²⁴

The impact of policy changes on higher education participation

As noted above, student finance exists to ensure that cost of study and affordability do not represent a barrier to participation in higher education.

Some student groups, especially those with protected characteristics, may be debt averse which may lead them to making poorer decisions about higher education,

²² Figure 5 – HE student enrolments by personal characteristics, English domicile, all countries of study, all years, all undergraduate, full-time https://www.hesa.ac.uk/data-and-analysis/sb265/figure-5

¹⁹ Page 54, Student Academic Experience Survey 2022 | Advance HE (advance-he.ac.uk)

²⁰ The household residual income threshold for full maintenance loan for full-time undergraduate students in £25,000. Data on proportion of students receiving maximum loan amounts are provided by the Students Loans Company.

²¹ UCAS End of Cycle Report 2022

²³ Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)

²⁴ Widening participation in higher education, Academic Year 2020/21

including choosing not to participate, even when it is in likely to benefit them in the long run.

Debt Aversion

Some protected groups may be debt averse which may lead them to making poorer decisions about higher education, including choosing not to participate, even when it is in likely to benefit them in the long run.

Research in 2015 showed that young people's attitudes to taking out student loan debt were more favourable in 2015 than in 2002, despite the increase in costs over the period. Also, that debt aversion was now similar among middle class students and lower-class students. However lower-class students were still more likely than students from other social classes to be deterred from planning to enter HE because of fear of debt²⁵. This report does not however follow up those students on their actual behaviour subsequent to the research.

Some groups are more likely to report that decisions are affected by the cost of HE, for example decisions around where to study, at which institution and whether to study locally. Students who were female, older students, those from ethnic backgrounds, those identified as having a health condition or disability and lower socio-economic groups were more likely to report this²⁶.

This will reflect in large part their personal circumstances (e.g. family or financial commitments) which will influence their perceptions of the costs, risks and benefits of investing in higher education.

While an increase in loan funding by 2.8% would increase student debt (in nominal terms only), equivalent increases in grant funding would not (since it does not need to be repaid). However, the income contingent nature of loan repayments means that the longer-term impact would only be felt by high/middle earning borrowers who go on to repay all or nearly all of their student loan. Any outstanding loan balance is cancelled at the end of the students' loan term.

The entry rates into higher education in 2022/23 for English-domiciled 18 year olds decreased for all ethnic groups, apart from Black applicants.²⁷ This follows the return to exam grading in 2022 after COVID related disruptions in 2020 and 2021. The entry rate for the most disadvantaged English 18 year olds (POLAR4 Q1) continued to increase in 2022. However, it is uncertain how these recent trends will be affected by

²⁵ Callender, C. and Mason, G. (2017) *Does student loan debt deter higher education participation: new evidence from England*

²⁶ Student income and expenditure survey 2014 to 2015 - GOV.UK (www.gov.uk)

²⁷ UCAS 2022 End of cycle report

the recent large spike in inflation.

However, three in ten (30%) pupils and learners in years 12 and 13 in 2022 said that their plans for education or training had changed because of the rising cost of living. This was consistent across different groups (ethnicity, sex, whether receiving Free School Meals) of pupils and learners. The most common themes that emerged related to looking at other options instead of university, for example apprenticeships, employment or taking a gap year, as well as not being able to afford university.

We do not have evidence that a 2.8% increase in maximum undergraduate loans for living costs, maintenance grants for full-time pre-August 2016 starters, full-time dependants grants and full-time, part-time and postgraduate disabled students' allowance will significantly alter participation decisions or have a differential impact across protected groups.

Further, there is little evidence that the 2012 reforms which saw a significant increase in HE fees and associated debt levels, have had a significant impact in deterring participation in higher education amongst disadvantaged groups of students. In addition, the experience of introducing loans for undergraduate students suggests students are increasingly accepting of debt when it represents an investment in their education.

As with undergraduate support, a 2.8% increase in the maximum amount of loan available for postgraduate master's degree courses and postgraduate doctoral degree courses for 2023/24 would likely have a relatively small impact on debtaverse groups.

²⁸ Parent, pupil and learner panel omnibus surveys for 2021 to 2022

Box 1: Debt aversion

Debt (or loan) aversion relates to the unwillingness of a person to borrow because of the financial costs associated with taking out a loan as well as the psychological effects such as anxiety and distress.²⁹ ³⁰This can lead to people choosing not to borrow even though it would very likely improve their personal circumstances in the long run.

In the context of higher education, debt aversion relates to the reluctance of students to take out loans to cover the cost of their studies even when investment in their human capital will deliver positive long-term returns in terms of better employment and earnings prospects.³¹

This may be driven by a mix of sociological and cultural factors. For example, students may come from families with negative attitudes towards debt that have been influenced by past experience of over-indebtedness and its consequences. Similarly, students and their families may have religious values or beliefs which discourages or does not allow borrowing, especially if the loans attract interest.

The literature on debt aversion in higher education has evolved over time, reflecting changes in the student finance system and the increasing shift in the cost of study away from the taxpayer to the student. Evidence on student attitudes to risk reveal that students have become more comfortable taking on debt to fund their studies.³²

²⁹ Baum, S. and Schwartz, S. (2013) Student aid, student behaviour and educational attainment

³⁰ Callender, C. and Mason, G. (2017) Does student loan debt deter higher education participation: new evidence from England

³¹ Callender and Mason (2017) found that in 2015, 74% of respondents stated that student loans to fund a university education represented a good investment. This compared with 52% when the same question was asked students in 2002. Much of the increase was attributed to more positive responses from female students.

³² Callender, C. and Mason, G. (2017) Does student loan debt deter higher education participation: new evidence from England

Impact of an inflationary increase to maximum DSA for 2023/24 on undergraduate and postgraduate DSA recipients.

As a general point, it is rare for students to take up the maximum, or close to the maximum, of the DSA. This is because DSA funding is awarded on the basis of need (i.e. it is awarded for specific disability-related support needs recommended by a needs assessor and approved by SLC). The vast majority of students currently use only a small proportion of the maximum DSA and so we forecast that they will see no change as a result of a 2.8% increase to the maximum DSA for 2023/24.

Our modelling indicates that it is extremely rare for any student to take up the maximum, or close to the maximum DSA. The very small numbers involved in this sub-group mean that it is not possible to consider whether students with particular protected characteristics are more likely to be negatively affected than others by freezing the maximum DSA.

Other proposed changes to higher education student finance for 2023/24

Changes to ordinary residence requirements for certain categories of student when picking up support as an event.

The Home Office has introduced a number of forms of leave to remain in the UK, where the recipient is deemed to be in need of international protection, which grant them almost exactly the same social rights as enjoyed by refugees: Humanitarian Protection, Stateless Persons leave, Calais leave, Section 67 ('Dubs') leave, Afghan Relocations and Assistance Policy, Afghan Citizens Resettlement Scheme and Ukraine scheme leave. For the purpose of HE Student Finance Regulations, these are referred to as types of 'protection-based' status. The Home Office has also made provision for the grant of indefinite leave to remain to persons who find themselves in difficult circumstances such as victims of domestic violence and bereaved partners.

It is the policy intent that these students should qualify for student support and home fee status where they are awarded one of these immigration statuses part way through their course. However, as HE Student Finance Regulations are currently drafted, to qualify for support and home fee status these students will need to have been ordinarily resident (including being lawfully resident) in England on the first day of the first academic year of the course. It may be difficult for students to demonstrate lawful residence before being awarded protection-based leave or indefinite leave as a victim of domestic violence or as a bereaved partner and could prevent students with these status' from qualifying for support part way through their course.

For 2023/24, undergraduate students with protection-based status and their family members, indefinite leave as a victim of domestic violence or as a bereaved partner and who acquire the relevant status after the date on which the first term of the first academic year of the course actually starts ("the course start date") are treated, as if they had lawful residence on the course start date.

Corresponding changes will apply to eligible students who are starting an academic year of a Postgraduate Master's or Doctoral Degree Course in 2023/24 so that they qualify for loans towards their course costs. The changes will also apply to students starting an academic year of a short course in 2023/24 so that they qualify for HE short courses loans and students starting a further education course so that they qualify for advanced learner loans.

Students with protection-based status and their family members and those with indefinite leave to remain as the victim of domestic violence or as a bereaved partner will be treated as if they had lawful residence on the course start date. This ensures students who are granted the relevant status after the course start date can still qualify for home fee status and, for undergraduate courses, be subject to maximum tuition fees.

Changes to the requirement to be ordinarily resident in England on the first day of the first academic year of the course for certain categories.

Students with protection-based status and their family members and persons with indefinite leave to remain as a victim of domestic violence or as a bereaved partner, qualify for student support where they can demonstrate ordinary residence in England on the first day of the first academic year of the course. This can often prove difficult for individuals in these groups who may not move to England until just before the actual start of their course which is after the first day of the first academic year of the course. For example, an academic year may begin on 1st September, but course start date could be 15th September.

Eligible students in the relevant groups starting an academic year of an undergraduate course in 2023/24 will instead need to be ordinarily resident on the day on which the course starts to qualify for support to qualify for fee loans and, where applicable, living costs support. Corresponding changes will apply to students starting an academic year of a Postgraduate Master's Degree or Doctoral Degree course in 2023/24 so that they qualify for postgraduate master's loans and postgraduate doctoral degree loans respectively.

Eligible students with protection-based status and their family members, and persons with indefinite leave to remain as a victim of domestic violence or as a bereaved partner who are starting an academic year of course in 2023/24, will qualify for home fee status if they have been ordinarily resident on the day on which the course starts and, in respect of undergraduate courses, will be subject to maximum tuition fees.

Analysis

The changes to the ordinary residence requirements for students picking up support as an event when they do not hold lawful residence on the relevant date, and changes to the date on which a person must show they meet the requirements at the start of their course, will have a positive impact on individuals as it will make it easier for them to access higher education sooner and provide them with the opportunity to benefit from the well documented high average financial returns associated with obtaining a

degree and from the wider, more social benefits associated with higher education study.

In relation to the specific impact on those with protected characteristics within the categories that these changes are being made, an analysis of the data available shows that the majority of persons granted refugee and humanitarian protection are between the ages of 18-49, are male and from the African Sub-Saharan, Middle East and Asia Central regions.³³ This means that the changes to the ordinary residence requirements are more likely to benefit men of a younger to middle age and from those regions.

For persons under the Ukraine schemes, published statistics show that in the period from January to June 2022, for those over the age of 18, a larger number of females have arrived (47,800) compared with males (11,510). Changes to the ordinary residence requirements, are therefore, more likely to have a positive impact on persons who share the protected characteristics of race (Ukrainian), age (over 18) and sex (female).³⁴

Due to the lower numbers of arrivals in other protection-based categories such as Calais leave, Stateless leave and Section 67 leave, there is limited data available on protected characteristics of these cohorts and accordingly, it is difficult to assess the impact of these changes, although we consider that any impact is not likely to be significant, but we would expect a positive impact on those who share the protected characteristics of race.

Currently demographic data for the Afghan Relocation and Assistance Policy (ARAP) and the Afghan Citizens Resettlement Scheme (ACRS) is not available. However, it is possible to make some assumptions on the expected demographics of these schemes in that these schemes are targeted at Afghan nationals, and in relation to the ACRS, at Afghan women and girls at risk and at those within the LGBT community. Our current assessment, therefore, is that the changes to the ordinary residence requirements will have positive impacts on persons within the protected characteristics relating to race (Afghan), sex (female) and sexual orientation (LGBT).

Similarly, there is no data on the protected characteristics of persons with indefinite leave to remain as a victim of domestic violence and as a bereaved partner. A reasonable assumption can, however, be made that the majority of such persons will

³³ https://www.gov.uk/government/statistical-data-sets/asylum-and-resettlement-datasets

³⁴ Statistics on Ukrainians in the UK - GOV.UK (www.gov.uk)

be female, and therefore, this proposal could particularly benefit those with the protected characteristic of sex.

On the data available we have been unable to assess the other protected characteristics covered by the Equality Duty.

Family members of persons with leave under the Afghan and Ukraine schemes.

The Student Support Regulations enable certain family members, to be awarded student support where their spouse, civil partner or parent has been granted Refugee status, Humanitarian Protection or Stateless leave. This enables specified family members to access student support on the basis of their family member's status.

Following the introduction of the Ukraine schemes by the Home Office, family members of persons with Ukraine scheme leave are in a directly comparable position to family members of Refugees, Humanitarian Protection and Stateless leave, who can access support regardless of status and nationality.

For students starting their courses in 2023/24, the following family members granted leave under one of the Ukraine schemes will qualify for student support: the spouse or civil partner of the person granted leave, the child of a person granted leave, or the child of the spouse or civil partner of a person granted leave. The spouse /civil partner must be in that relationship on the leave application date and the child must be the child of that person and under the age of 18 years on the leave application date.

Amendments are also being made for 2023/24 to align the requirements for that the spouse or civil partner of the person granted leave, the child of a person granted leave or the child of the spouse or civil partner of a person granted leave under either the Afghan Relocations and Assistance Policy (ARAP) or the Afghan Citizens Resettlement Scheme (ACRS) schemes, qualify for student support.

The spouse /civil partner must be in that relationship on the leave application date and the child must be the child of that person and under the age of 18 years on the leave application date. These definitions are now aligned with those for family members of Refugees, HP and Stateless leave. Changes in respect of the Afghan schemes will apply in respect of an academic year starting in 2023/24 where the current course started in 2022/23.

Corresponding changes will apply to students starting an academic year of a Postgraduate Master's Degree or Doctoral Degree course in 2023/24 so that they qualify for postgraduate master's loans and postgraduate doctoral degree loans respectively and to students starting an academic year of a Further Education Course so that they qualify for Advanced Learner Loans.

Analysis

The changes to include family members of persons under the Ukraine Schemes and to align the requirements for family members of persons under the Afghan schemes, is likely to have a positive impact on individuals as it will make it easier for them to access higher education sooner and provide them with the opportunity to benefit from the well documented high average financial returns associated with obtaining a degree and from the wider, more social benefits associated with higher education study.

As most family members will already be granted leave under the Afghan and Ukraine schemes, these changes are more likely to benefit British citizens or persons with another form of immigration status who could not otherwise access immediate student support. A reasonable assumption can, however, be made this proposal could particularly benefit those with the protected characteristic of race (British).

Designation of Higher Technical Qualifications for student support.

The Government is introducing a new type of qualification at levels 4 and 5 of the Regulated Qualifications Framework, the Higher Technical Qualification (HTQ), which aims to improve the quality of technical education on offer. HTQs are intended to encourage more people to take higher technical courses which improve their employment prospects and meet employers' skills needs. Eligible students undertaking HTQs will qualify for student support and home fee status and will be subject to maximum fee limits.

Courses leading to HTQs that have been approved by the Institute for Apprenticeships and Technical Education are "designated courses" for the purposes of student support. Eligible undergraduate students starting full-time and part-time courses in 2023/24 leading to these approved HTQs can qualify for fee loans and, where applicable, disabled students' allowance. Students attending full-time HTQs designated for support will, in addition, qualify for loans for living costs and, where applicable, long courses loans and grants for dependants.

Most part-time level 4 and 5 courses do not currently attract loans for living costs. However, undergraduate students starting part-time HTQ courses in 2023/24 will qualify for part-time loans for living costs.

In addition, eligible students who complete an approved HTQ course and achieve a qualification will qualify for fee loans and living costs support for a 'top up' honours degree course.

Analysis

We are addressing financial barriers for learners by putting the student finance package for level 4 and 5 HTQs on a par with level 6 degree courses from academic year 2023/24.

This change is likely to have a positive impact on people of all backgrounds. It will benefit a number of groups with protected characteristics, namely females, older learners, and learners from ethnic minority backgrounds (with exception of learners from Asian backgrounds, see below). Utilising the Higher-Level Learners in England (AY 20/21) dataset we find there are proportionately more females studying level 4 and 5 than in the UK population. There are proportionately fewer learners from Asian backgrounds studying at Level and 5 than in the UK population. This is in contrast with learners from other ethnic minority backgrounds, proportionately more of whom study level 4 and 5 than in the UK population.

Additionally, level 4 and 5 learners are on average older than learners studying degrees. Finally, learners identifying as having at least one disability are less likely to study level 4 and 5 (when compared to the proportion of people in the UK). We do not have data on the remaining protected characteristics but in the Higher Technical Education consultation we anticipated that HTQ reforms on the whole would not have any particular impact relating to these protected characteristics and we assume the same for these support changes.

The change will also benefit learners from disadvantaged backgrounds, as, in comparison with learners studying at Level 6, learners who study at classroom-based level 4/5 are more likely to come from disadvantaged backgrounds.

Table 3: Protected characteristics of full-time undergraduate enrolments by nationality¹ and domicile²

English Higher Education Institutions Academic Year 2020/21

		UK Nationalities					EU Nationalities				All Nationalities			
		Domicile				Domicile				Domicile				
		UK	Gibraltar	British Overseas Territories ³	EU Overseas Territories ⁴	UK	Gibraltar	British Overseas Territories ³	EU Overseas Territories ⁴	UK	Gibraltar	British Overseas Territories ³	EU Overseas Territories ⁴	
	20 years & under	63.3%	74.2%	57.8%	[c]	34.5%	77.7%	[c]	35.2%	59.2%	76.5%	55.3%	30.6%	
	21-24 years	24.5%	23.6%	30.5%	[c]	21.7%	20.5%	[c]	40.7%	24.2%	21.7%	32.7%	40.3%	
Age⁵	25-29 years	4.7%	0.9%	4.9%	[c]	13.6%	1.2%	[c]	22.2%	5.8%	1.1%	5.5%	22.6%	
	30 years & over	7.5%	1.3%	6.7%	[c]	30.1%	0.6%	[c]	1.9%	10.9%	0.8%	6.5%	6.5%	
	Age unknown ⁶	-	-	-		-	-	-	-	-	-	-	-	
	Female	56.7%	51.9%	60.0%	[c]	58.1%	51.6%	[c]	57.4%	56.9%	51.7%	59.8%	56.5%	
Gender	Male	43.1%	48.1%	40.0%	[c]	41.9%	48.2%	[c]	42.6%	42.9%	48.2%	40.2%	43.5%	
	Other	0.2%	0.0%	0.0%	[c]	0.1%	0.2%	[c]	0.0%	0.2%	0.1%	0.0%	0.0%	
Disability	Known disability	20.3%	14.6%	15.9%	[c]	7.4%	13.2%	[c]	9.3%	18.6%	13.6%	14.4%	9.7%	
status	No known disability	79.7%	85.4%	84.1%	[c]	92.6%	86.8%	[c]	90.7%	81.4%	86.4%	85.6%	90.3%	
	White	70.0%				68.3%				67.1%				
Ethnicity	Asian	7.7%				13.5%				10.0%				
	Black Other (including	15.1%		NA ⁷		8.7%		NA ⁷		15.3%		NA ⁷		
	mixed)	7.2%				9.6%				7.6%				
	Ethnicity unknown ⁶	-				-				-				

Grand Total 996,420 235 565 0 119,305 520 20 55 1,168,850 755 925 60

Source

DfE analysis of Higher Education Statistics Agency (HESA) Student Record

Notes

Figures are based on HESA standard higher education registration population

Figures have been rounded up or down to the nearest five, so components may not sum to totals

Percentages are calculated using unrounded figures

Shorthand is used in this table, [c] = confidential and suppressed due to fewer than 23 counts in the denominator

¹Nationality is defined as country of legal nationality

¹Where a student has dual-nationality, if one nationality is British then they are coded as UK nationality. If neither nationality is British but one is non-UK EU, then they are coded as relevant EU country nationality.

¹Otherwise, they are coded as either country. More information on HESA definitions of nationality can be found here:

¹https://www.hesa.ac.uk/collection/c17051/a/nation

²Domicile refers to country of student's permanent home address prior to entry to the course. More information regarding domicile can be found here:

²https://www.hesa.ac.uk/collection/c19051/a/domicile

³British Overseas Territories include: Anguilla, Bermuda, British Virgin Islands, Cayman Islands, Falkland Islands, Montserrat, Pitcairn Islands, South Georgia and South Sandwich Islands, St Helena,

³Ascension and Tristan da Cunha, Turks and Caicos Islands

⁴<u>EU Overseas Territories include</u>: Greenland and Faroe Isles (Denmark possession), Netherlands Antilles (Bonaire, Curacao, Saba, St Eustatius and St Maarten) and Aruba (Netherlands possession).

⁴New Caledonia, French Polynesia, Wallis and Futuna Mayotte, St Pierre et Miguelon, French Southern Territories, St Barthelemy (French possession)

⁵Age is captured at 31 August of the academic year

⁶Percentages are calculated using known values only

⁷Ethnicity data is only available for UK domiciled students

Omitted Countries

HESA defines 'no settled inhabitants' as no inhabitants apart from military and scientific personnel, staff of contractors and seasonal residents

Antarctic Territories are omitted as there are 'no settled inhabitants'. Although there are a number of national territorial claims to parts of Antarctica, these have been in abeyance since the Antarctic Treaty in 1961

British Indian Ocean Territories is omitted as indigenous inhabitants have been displaced elsewhere and as such there are no settled inhabitants

Omitted Countries Source

https://www.hesa.ac.uk/collection/c18051/a/domicile

Family Test Analysis

Our Family Test Analysis indicates that in general a 2.8% increase to loans and grants for living costs for 2023/24 would not have a particular impact on families. The increase in debt resulting from a 2.8% increase in maximum loans would be in nominal terms only meaning that students with family commitments will be no worse or better off as a result. Moreover, the income contingent nature of loan repayments means that the longer-term impact will only be felt by those students with family commitments who go on to earn more than the relevant repayment threshold for their loan type after they graduate. Repayment thresholds are set at £27,295 per year for post-2012 (Plan 2) loans, £21,000 per year for postgraduate master's degree and doctoral degree loans (Plan 3), and £25,000 for student loan borrowers starting new courses from the 2023/24 academic year onwards (Plan 5).

We don't have evidence that the 2.8% uprating to loans and grants will have a differential impact on families, however students with dependants may be more vulnerable to financial risk. A 2.8% increase for 2023/24 to maximum dependants' grants (ADG, CCG and PLA) and disabled students' allowances would not have a significant enough impact on financial resources to influence family formation.

Changes to eligibility criteria for 2023/24 will increase the number of people who are likely to be eligible for student support to undertake higher education courses and may assist access where specific grants are available for those students who are parents and for those with childcare and adult dependent responsibilities.

The introduction of designated HTQs should also increase the number of people entitled to student support to undertake higher education courses and may assist access for students with adult or child dependents who can access dependants' grants for full-time courses. Students with families who are attending part-time HTQs may also be helped by the introduction of part-time loans for living costs for these courses.



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