

BIS | Department for Business
Innovation & Skills

**INTERIM EQUALITY IMPACT
ASSESSMENT**

**Urgent reforms to higher
education funding and
student finance**

NOVEMBER 2010

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Introduction

This Interim Equality Impact Assessment is issued in parallel with the draft Higher Education (Basic Amount) (England) Regulations 2010. The assessment relates however to the full package of urgent reforms to higher education funding and student finance which the government proposes to put in place before the start of Academic Year 2012/13. A full Equality Impact Assessment will be conducted in conjunction with the Government White Paper on Higher Education in 2011.

Any queries about this Interim EQIA should be addressed to:

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The proposed package is assessed to have an overall likely positive effect on female, disabled and ethnic minority individuals who are considering participation in Higher Education. A possible negative effect on some Muslim students is recognised.

A list of those organisations and individuals involved in the consultation process is provided in the Annex.

Scope of this Equality Impact Assessment

The Department for Business, Innovation and Skills (BIS) is subject to the public sector duties as set out in the Equality Act 2010. Equality Impact Assessments are an important mechanism for ensuring that we gather data to enable us to identify the likely positive and negative impacts that policy proposals may have on certain groups of consumers and to estimate whether such impacts disproportionately affect such groups. This Equality Impact Assessment takes an initial summary view of the equality impact of reform of higher education funding and student finance in England.

Proposals with multiple strands

This EQIA covers a package of reforms to student support and higher education funding, including repayment of student loans, which are subject to parliamentary approval of a number of different regulations. It does not cover broader issues such as governance and regulatory bodies. The equality impact of proposals on these issues will be considered in conjunction with a Higher Education White Paper in 2011.

Title

Urgent reforms to higher education funding and student finance in England

Key facts and findings

Full-Time Study:

- There are many factors which could act to influence student behaviour and likelihood of participation in HE, including how changes to the system are interpreted, the price elasticity of demand and the current level of excess demand.
- Measures in place are expected to assist in preventing any worsening of the current participation gap between **lower and higher socio-economic groups**. The increase in maintenance grant for students from household with the lowest incomes, the National Scholarship Programme, and additional fair access requirements on institutions wanting to charge over £6,000 in graduate contributions should ensure that the reforms do not affect individuals from lower socio-economic backgrounds disproportionately.
- The changes to the maintenance package will benefit students on low household incomes most, and therefore people from **ethnic minority** backgrounds are more likely to benefit from the more generous support packages.
- We do not expect the reforms to student support to have any disproportionately negative impact on **disabled students**; the student finance arrangement will continue to include financial support for disabled students.¹
- Graduates will be expected to contribute more towards the cost of their higher education, yet we have estimated that up to 25% of graduates will repay less under the new system than they would have under the old system. The graduates who are likely to repay less are more likely to be **female, disabled**, and from an **ethnic minority background**.
- Interest rates greater than RPI will now be charged, in an income-contingent manner, on loans. These loans will still be subsidised by Government and the maximum rate payable would be different from a commercial rate of interest. However, the possible negative impact on some **Muslim** students must be acknowledged.

¹ SKILL, an organisation representing disabled students, was on the Advisory Forum for the Browne Review. No concerns about how disabled students might disproportionately be affected by the policy proposals being considered during the Review were raised, nor has SKILL raised any concerns since the report has been published. SKILL will have disseminated the call for evidence and call for proposals wider in the community of groups representing disabled students, and the Browne Review received no submissions that suggested there were issues.

- We have no reason to believe that the reforms would impact more negatively on any of the other protected groups.²

Part-Time Study:

- Removing means-tested grants for maintenance and replacing them by non-means tested loans will affect the amount of maintenance support that is repayable for those students³ from low income backgrounds who are currently eligible for grants. However, we believe that this is unlikely to affect participation considerably.
- We are making part-time study free at the point of entry to all eligible students studying at a minimum of 33% intensity, and a larger proportion of part-time students will now benefit from student support.

² The Browne Review also consulted with the NUS, who did not raise issues relating to any particular group of students.

³ Eligible students are those who are studying towards their first degree on a course deemed eligible according to the current regulations.

Description of the policy

The Independent Review of Higher Education Funding and Student Finance (the “Browne Review”) highlighted the need to put the future funding of higher education on a sustainable footing, putting funding in the hands of students and making institutions more responsive to their needs while attracting a higher proportion of students from under-represented groups.

At the same time, the 2010 Spending Review imposed tight public resource constraints within which the higher education system will have to operate over the next few years.

In response to these two developments, the Government plans the following changes:

Institutional Funding

- a) Funding for HEIs and colleges for HE tuition will increasingly flow through Government-backed loans to students rather than through the HEFCE Teaching Grant. Teaching grants distributed to institutions through HEFCE would be reduced each year from 2012-13, by a total of £2.7bn in 2014-15. This is the effect achieved by withdrawing, for each new cohort of entrants, teaching grant funding of an equivalent amount to the removal of bands C and D of the current funding system from an overall total, across the board for all subjects. Funding will remain in the teaching grant for Bands A and B to support delivery of laboratory-based subjects such as sciences, engineering and medicine.
- b) Universities will be able to ask students for a higher graduate contribution than at present (currently up to £3,290) and Government backed loans will support these increased levels.
- c) Each university and college would be free to decide what contribution level it sets for each of its courses, up to a level of £6000 and in exceptional circumstances £9000.
- d) Universities and colleges that want to charge at or below £6,000 (“the basic level”) will continue to have to meet the conditions set by the Higher Education Funding Council for England as applicable to any institution that receives public funding.
- e) Universities and colleges that want to charge above £6,000 up to a maximum of £9000 for any or all of their courses will first have to secure the agreement of the Office for Fair Access. Access agreements will be expected to include activities such as outreach initiatives to attract more students to apply from under-represented groups, including those from disadvantaged backgrounds, and targeted scholarships and other financial support for poorer students.

- f) Every university charging over £6,000 will engage with the new National Scholarship Programme, which will in due course replace the current requirements on Universities to provide a minimum bursary⁴.

Student Support

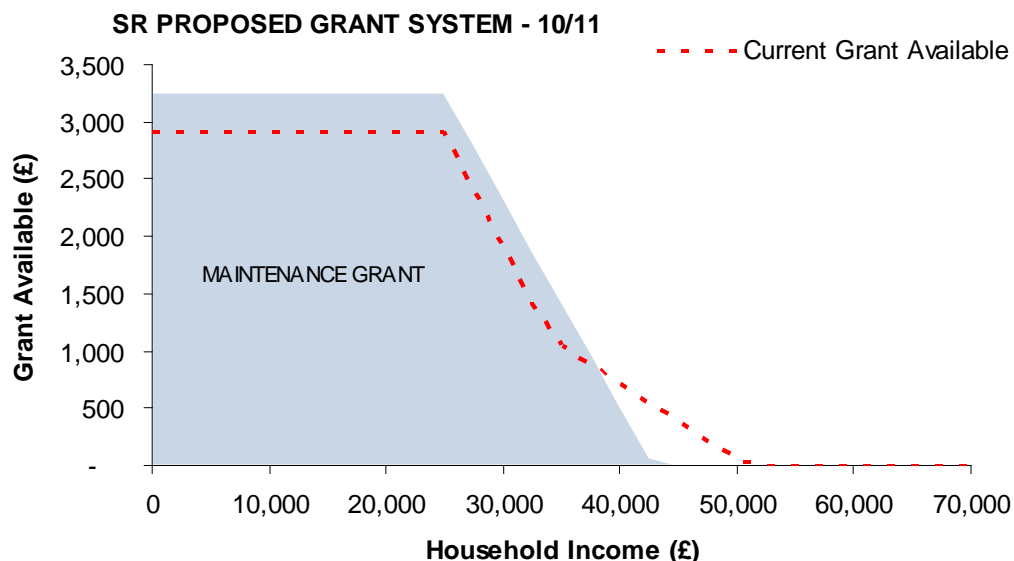
- g) The package of finance available for tuition and maintenance costs for students would ensure that higher education remained free at the point of delivery. Support for living costs will be related to the income of the student's household. Poorer students will get more grant support, which does not have to be repaid, than now.
- h) Almost all (around 95%) students will be able to get as much support for living costs as now through the combination of grant and loans.
- Grants for full-support group students (sponsor income \leq £25,000) will increase by £344 from £2,906 to £3,250.
 - Grants for nil-support group students (sponsor income \geq £52,500) will not change and stay at £0.
 - In the partial-support group (sponsor income $>$ £25,000 but $<$ £52,500), students with incomes \leq £38,400 will have a higher level of grant while those with incomes \geq £38,400 will have a lower level.

Table 1: Changes in maintenance grant levels by household income

Household Income (£)	Current (2010/11)	New	Difference
under 25,000	2,906	3,250	344
25,000	2,906	3,250	344
27,500	2,406	2,795	389
30,000	1,906	2,341	435
32,500	1,406	1,886	480
35,000	1,040	1,432	392
37,500	875	977	102
40,000	710	523	-187
42,500	546	68	-478
45,000	381	0	-381
47,500	216	0	-216
50,000	51	0	-51
52,500	0	0	0
55,000	0	0	0
57,500	0	0	0
60,000	0	0	0
62,500	0	0	0
65,000	0	0	0
67,500	0	0	0
Over 67,500	0	0	0

⁴ Bursaries have been shown in research published by OFFA not to be an effective means of widening participation at the most selective universities. (For the full report, 'Have bursaries influenced choices between universities', please see www.offa.org.uk/publications).

Figure 1: Changes in maintenance grant levels by household income



- i) With a few minor exceptions, all students will also receive larger maintenance loans under the new system. This is to make sure that, in combination with maintenance grants, the vast majority of students will be better off in cash-in-hand terms than under the current system.

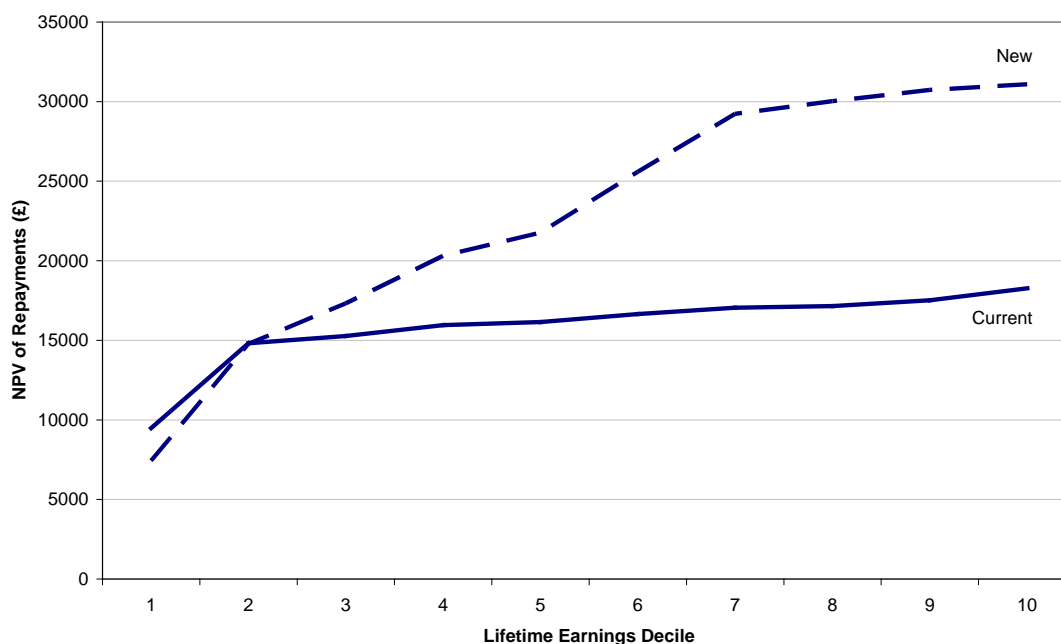
Table 2: Changes in maintenance loan levels by household income

Household Income (£)	Current (2010/11)	New	Difference
under 25,000	3,497	3,875	378
25,000	3,497	3,875	378
27,500	3,747	4,102	355
30,000	3,997	4,330	333
32,500	4,247	4,557	310
35,000	4,430	4,784	354
37,500	4512	5011	499
40,000	4595	5239	644
42,500	4677	5466	789
45,000	4760	5288	528
47,500	4842	5038	196
50,000	4924	4788	-136
52,500	4606	4538	-68
55,000	4106	4288	182
57,500	3606	4038	432
60,000	3564	3788	224
62,500	3564	3575	11
65,000	3564	3575	11
67,500	3564	3575	11
Over 67,500	3564	3575	11

Graduate Contributions

- j) Individuals will make repayments in an income-contingent manner. As a result of the increase in maintenance loans and the level of graduate contribution HEIs will expect, the amount to be repaid will increase from current levels, but the amount of the monthly repayments will decrease.
- k) The terms would be more progressive than now, with graduates only repaying when they are earning above a threshold of £21,000 and with higher earners contributing more and low/non earners given substantial exemptions.
- l) The Government will consult on potential early repayment mechanisms so that people on high incomes are not able to unfairly buy themselves out of this progressive system. These mechanisms would need to ensure that graduates on modest incomes who strive to pay their contribution early through regular payments are not penalised.
- m) Changes in the repayment conditions will be such that we estimate that up to 25% of graduates (further information in the evidence base) will be better off under the new system than they would have been under the old system. Key changes include:
 - The term of the loan will increase from 25 to 30 years;
 - The earnings threshold at which repayment starts will increase from £15k to £21k.
 - The maximum interest charged on the loan will increase from RPI to RPI + 3%. Interest rates would be graduated above the £21,000 threshold, at which the rate would be RPI, increasing in a straight line with graduate income, reaching the full 3% above RPI only at £41,000

Figure 2: Changes in graduate contributions by lifetime graduate earnings



Fair Access

- n) As mentioned above, the conditions required in respect of fair access will be linked to the level of graduate contributions and how far an institution has to go in meeting widening participation benchmarks.
- o) Universities and colleges that want to charge above £6,000 for any or all of their courses will first have to get the agreement of the Office for Fair Access, as at present, but meet tougher access conditions. This will include a requirement to invest some of their additional fee income in access, including through the new National Scholarship Programme. Failure to meet the terms of the Access Agreement can mean a substantial fine or the loss of the ability to charge higher fees.
- p) The package of finance for tuition and maintenance costs provided for students while at university would ensure that higher education remained free at the point of delivery; that support with living costs was income-related, with poorer students getting more grant support than now, and almost all students able to get as much support as now through loans.
- q) We will also set up a new £150m National Scholarships Programme targeted at bright potential students from poor backgrounds. It will guarantee students benefits such as a free first year or foundation year.

Changes to part-time undergraduate student support

- r) Non-means-tested loans will be provided to cover the cost of part-time courses (as long as students study at least 33% intensity). Means-tested maintenance and fee grants for part-time students will be withdrawn.

The evidence base

This section analyses whether the changes outlined above are likely to impact adversely and disproportionately, or positively, on some protected groups. Where possible, the effects on socio-economic background, age, race, disability and sex are analysed. There is no data currently available to assess the impact on sexual orientation, gender reassignment, marriage and civil partnerships, religion or belief, pregnancy and maternity – but the effects on these groups have been considered where possible.

The changes represent a reform of investment in HE so that there is less public subsidy and a greater contribution from those who benefit. Graduates are the main beneficiaries from HE, experiencing a lifelong income premium of, on average, £100,000 net of tax compared to those that leave school at 18⁵. So we are reducing the cost burden of higher education for non-beneficiaries, who have lower earnings on average (and are more likely to be from protected groups).

Research has shown that an increase in the cost of Higher Education would have a negative impact on the demand for HE if implemented in the absence of adequate student support and requiring students to pay upfront. The Institute for Fiscal Studies 2010 demonstrates that students are price sensitive and that participation in HE is negatively affected by increases in the price of HE. In addition, this research suggests that individuals from poorer backgrounds are more sensitive to changes in price. However, this same research also suggests that it is possible to counteract increased costs in HE by ensuring that students are not required to pay up-front (for example by providing fee loans), and by providing appropriate levels of maintenance support. As part of the reform package, we are increasing the maintenance grants given to the poorest students and (as discussed in the next section) the level of maintenance loan given to the majority of students:

Impact of higher graduate contributions and changes in the repayment conditions

As outlined in the previous section (Figure 2), we estimate that, despite the increase in expected graduate contributions and changes in the repayment conditions, up to 25% of graduates will end up repaying less than they would have under the previous system. This is predominantly because the earnings threshold at which repayments start will be raised from £15k to £21k. As a result, low earners (including many part-time workers) will be more likely to fall under the protection of the higher threshold. Analysis of the Labour Force Survey (see

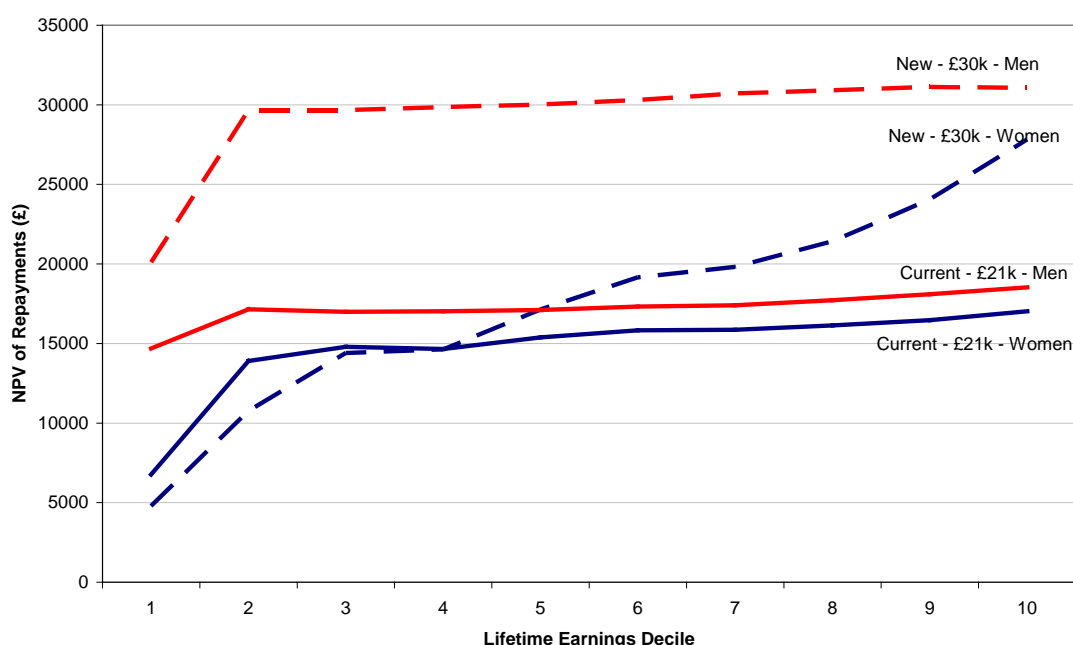
⁵ This estimate is based on both external studies and internal analysis. The external studies are:

- The Return to a University Education in Great Britain, O’Leary, N.C. and P.J. Sloane (2005), National Institute Economic Review, no. 193; pp 75-89 (they found the lifetime earnings premium, net of taxes, was £141,539 for males and £157,928 for females).
- The Economic Benefits of a degree, UUK/PWC, Feb 2007 (this gave the graduate premium as being around £160,000 gross) (<http://www.universitiesuk.ac.uk/Publications/Documents/research-gradprem.pdf>)

below) shows that female, ethnic minority, and disabled graduates⁶ tend to earn less, so these changes should benefit them disproportionately.

As an illustration, we have estimated how an average female graduate and an average male graduate would fare under the new proposed system compared to the present system. The total amount liable for repayment upon graduation is assumed to be £21k under the old system and to be £30k under the new system. The analysis shows how the lowest-earning women graduates will end up paying less under the new system than under the current system. This is not the case for males, since on average they are less likely to be represented in the lowest income deciles of the total population over their working lives.

Figure 3: Changes in graduate contributions by lifetime graduate earnings and by gender

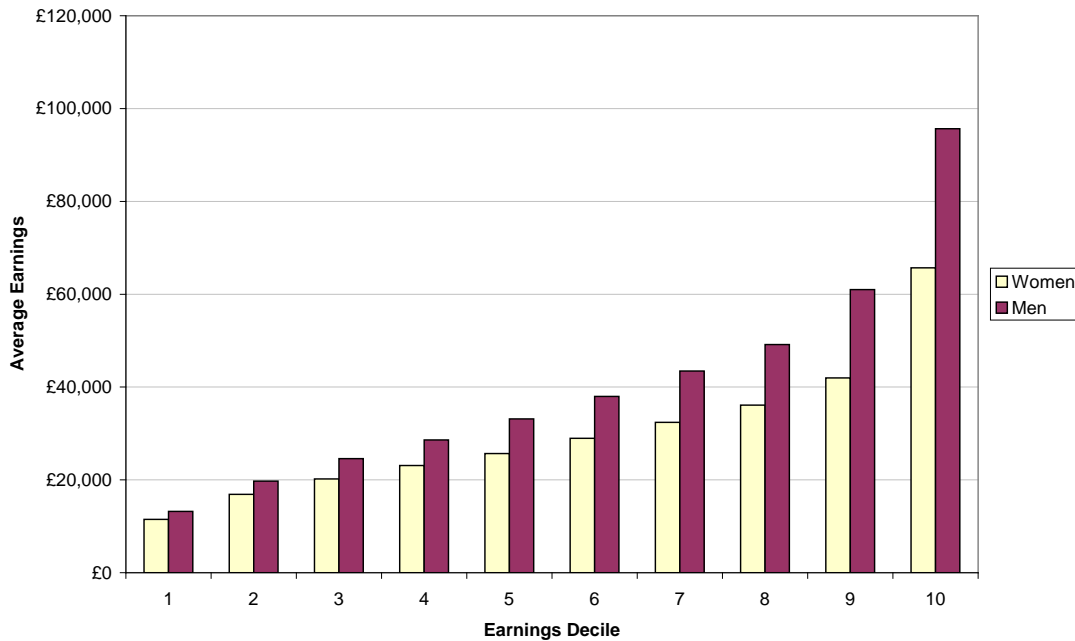


So the new system will benefit women, particularly those that take time out to have a family. Although men have considerably lower participation rates in Higher Education than women, this is related to similar gaps in prior attainment (see Broecke and Hamed, 2008). Female

⁶ Disabled students will also face higher participation costs as a result of their disability. We support disabled students in higher education through targeted funding, both directly and also through the Higher Education Funding Council for England (HEFCE) we provide funding to higher education institutions. The funding we provide through HEFCE to institutions is aimed at helping them meet the diverse needs of disabled students; this totalled approximately £13 million in 2010/11. Directly, we provide support through Disabled Students' Allowances (DSAs). DSAs aim to help students with disabilities, specific learning difficulties and mental health conditions. DSA's can help to remove the obstacles that prevent disabled students from entering and completing higher education courses by helping to pay the extra costs a disabled student may incur attending a course of higher education, as a direct result of their disability. It is important to note that disabled students are also not a homogenous group, and their participation in, and experience of, Higher Education will vary considerably depending on the disability they have. More analysis of disabled students and Higher Education is available here: http://www.bis.gov.uk/assets/biscore/corporate/migratedd/publications/d/dius_rr_09_06.pdf

graduates are less likely to be employed⁷ and, when they are employed, they tend to have lower earnings. Figure 4 below shows the average earnings by earnings decile for males and females separately: male graduate earnings clearly exceed female graduate earnings.

Figure 4: Earnings distribution of individuals with 1st degree qualifications, by gender (entire labour force)

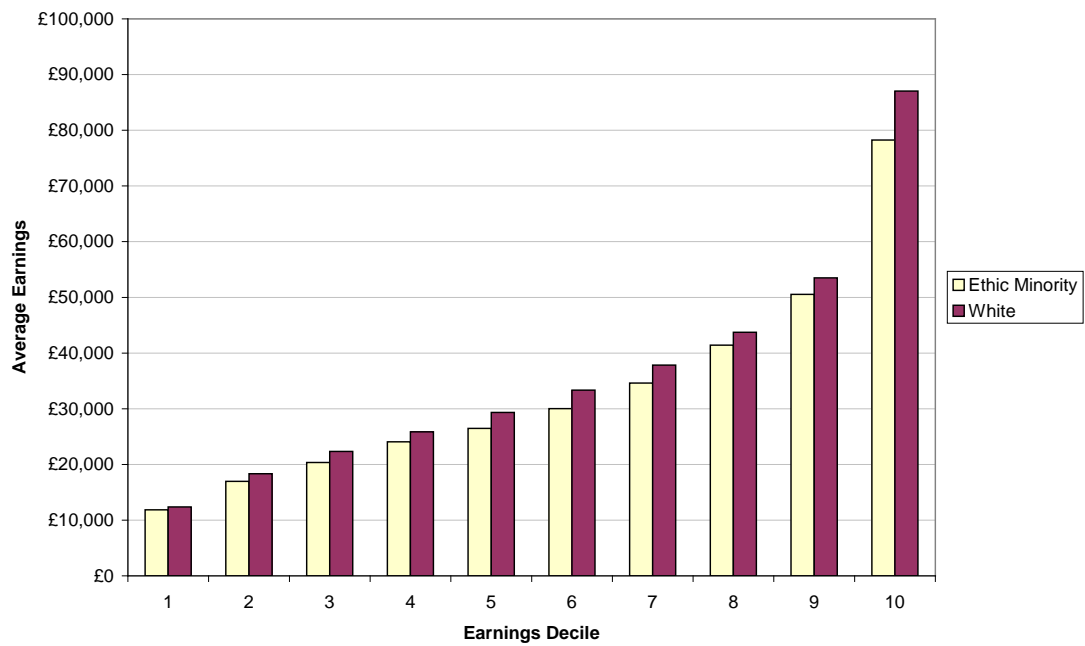


(Source: LFS 2008 Q3 - 2010 Q2, Working age population, Full time workers currently employed & First degree graduates only)

Although equivalent modelling is not available split by ethnicity and disability, we expect that the changes in the repayment conditions to be favourable to ethnic minority and disabled graduates because of their lower position in the graduate earnings distribution. The figures below reproduce Figure 4 for ethnicity and disability status respectively: the earnings of ethnic minority and disabled graduates are clearly lower than those of white and non-disabled.

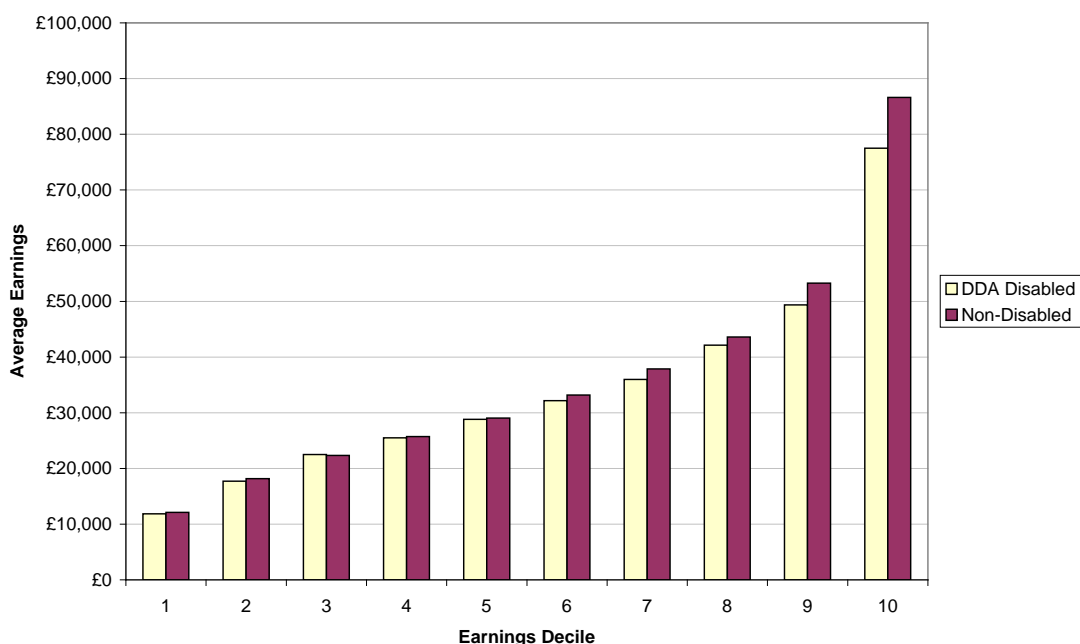
⁷ Internal analysis of pooled Labour Force Survey data (Q3 - 2010 Q2) suggests that 88% of male first degree graduates are in employment, compared to 84% of female first degree graduates.

Figure 5: Earnings distribution of individuals with 1st degree qualifications, by ethnicity (entire labour force)



Source: LFS 2008 Q3 - 2010 Q2, Working age population, Full time workers currently employed & First degree graduates only.

Figure 6: Earnings distribution of individuals with 1st degree qualifications, by disability status (entire labour force)



Source: LFS 2008 Q3 - 2010 Q2, Working age population, Full time workers currently employed & First degree graduates only

The impact for older graduates is more difficult to assess. On the one hand, older graduates are likely to have higher earnings, however they will also face shorter remaining working lives and so more of them are likely to have their debt forgiven.

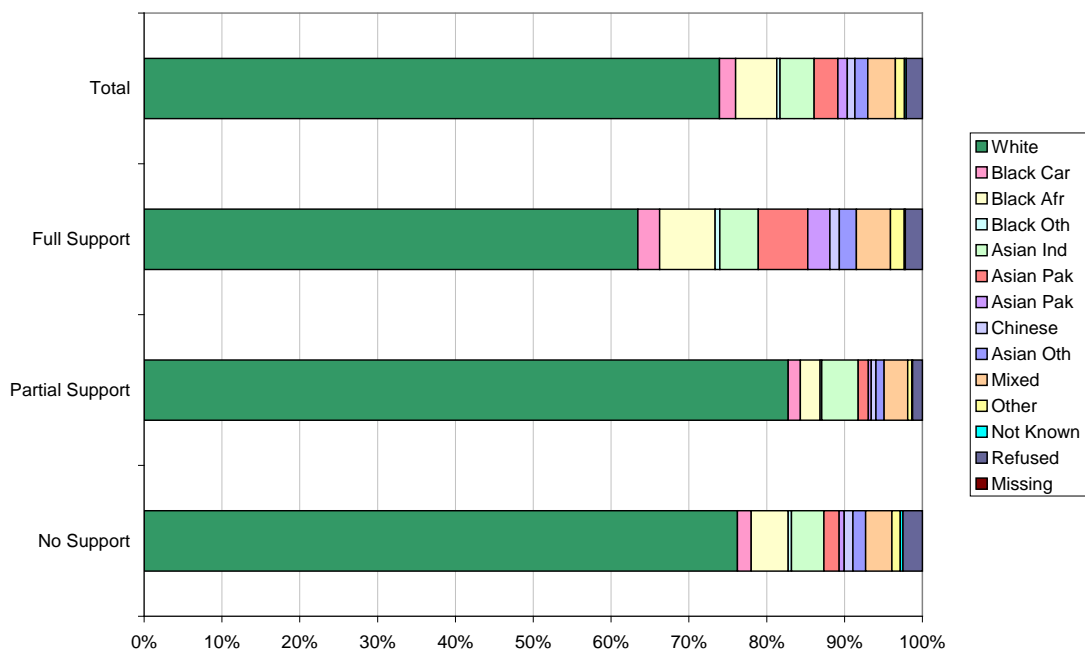
The new interest charged on the loan will increase from RPI to a maximum of RPI + 3%. As a result, those graduates who end up with the highest lifetime earnings may repay more than the amount they borrowed plus the government’s cost of borrowing. This might deter some Muslim students from taking advantage of the scheme. This was raised as a concern by a member of FOSIS (Federation of Student Islamic Societies) to the Browne review, because real interest rates may be considered non-shariah compliant by some Muslim students taking a strict interpretation of the shariah law on interest. However, the loans will be below commercial rates for equivalent loans, and will still be subsidised by the Government. Interpretations of shariah law differ, and some interpretations indicate that the payment of interest is a problem only if it leads to a profit for the lender. We recognise that some Muslim students will have concerns and we will continue to discuss the issues with their representative organisations.

Impact of changes to maintenance grants

The proposed new package would mean that poorer students would get more grant support than now.

Analysis of Higher Education Statistics Agency (HESA) data matched to Student Loans Company data suggests that recipients of full maintenance grants are more likely to be from an ethnic minority background (and this applies all ethnic minority groups) than the average entrant to full-time undergraduate courses.

Figure 7: Ethnic make-up of Full, Partial and Nil support groups in Higher Education (full-time undergraduates entrants, English-domiciled, UK HEIs, 2008/09)



Source: matched HESA-SLC data

In terms of age, sex and disability, there are no large differences between full grant recipients and the average entrant to full-time undergraduate courses. As a result, we expect the increase in full-time grants to benefit students from ethnic minority backgrounds in particular.

A small number of individuals (those with household incomes between £47,000 and £53,000 - around 5% of all students) will see their support reduced. Analysis of the same HESA-SLC data suggests that these individuals are slightly less likely to have a disability, are less likely to be from an ethnic minority background, and are significantly less likely to be mature.

Overall the evidence supports the view that these small cuts in grants should not impact adversely on individuals from protected groups.

Impact of changes to part-time undergraduate student support

The rationale behind the changes to the part-time support package is a desire to put part-time students on the same footing as full-time students; to extend the principle that students should not be deterred because of up front charges and to simplify the system.

Relatively few part-time students currently receive course and fee grants, and the amounts received are relatively small as well: we have estimated that currently around 59k Part-Time students receive a course grant of an average value of £260 per year. Similarly, around 57k Part-Time students receive a fee grant of an average value of around £700 per year.

In addition, there is little evidence to suggest that participation costs are a major barrier to part-time study. The main cost of part-time study for most students is their foregone earnings. Indeed, the main reason most part-time students study part-time is because they cannot afford to give up their job (UUK policy briefing). Part-time students are also most likely to be in employment, so there is an assumption that income derived from this should cover their maintenance costs. According to SIES 2007/08 some 81% of part-time students work and most of these are in a continuous/permanent job. Note that SIES only covers part-time students on 50% or more of an FTE. Including students with lower study intensities would probably cause this proportion to rise.

Removing means-tested grants and replacing them by non-means tested loans will affect those students from low income backgrounds who are currently eligible. However, whether the individual (student + graduate) will gain/lose from these proposals depends on their graduate earnings. As for full-time study, the highest earning graduates will be asked to contribute more, whereas the lowest earning graduates will not have to contribute if their earnings are below the £21k threshold. So, whereas under the previous system contributions were related to the background of the student, under the proposed system, contributions would be related to the earnings of the graduate. For those eligible for fee loans, part-time study will now become free at the point of entry.

The proposed changes would also mean more students would benefit from support. We have estimated that, currently, 15% of all part-time students receive a grant, and around 35% of students studying for their first degree. Under the proposed system, 30% of all part-time students would be entitled to a loan, around 67% of students studying for their first degree.

For students who would not be eligible for a fee loan, there is a risk that the fee set by institutions would increase. However, it is impossible to predict and/or quantify both the likelihood and the impact of this happening.

HEFCE data from 2007/08 suggests that the average UG PT FTE fee was £1,805, significantly less than the UG FT fee of £3,070.

In terms of the protected groups, the vast majority of part-time students are women (but note that female participation rates in HE are higher than male participation rates for both full- and part-time study). Ethnic Minority students are less likely to study part-time, as are disabled students. The vast majority of part-time students are mature.

Table 3: Characteristics of Full-Time and Part-Time Undergraduate Entrants to Undergraduate course (2008/09, English-domiciled students only)

Group	Full-time entrants	Part-time entrants
Female	55.8%	65.5%
Ethnic minority	23.8%	14.1%
Disabled	8.6%	6.0%
Mature	26.4%	91.7%

Source: HESA 2008/09 student record

Monitoring and review

As for the changes implemented following the 2006/07 reforms, we shall continue to monitor (on an annual basis):

The proportion of students who are:

- Female
- From an ethnic minority background
- Disabled
- Mature (using HESA data)

The proportion of applicants/accepted applicants who are:

- Female
- From an ethnic minority background
- Disabled
- Mature (using UCAS data)

The proportion of English-domiciled state school pupils who progress to Higher Education by:

- Gender
- Ethnicity
- Special Educational Needs status (using matched NPD-HESA data)

The income and expenditure of students by:

- Gender
- Ethnicity
- Disability (sample sizes permitting)
- Age (using the Student Income and Expenditure Survey)

Student satisfaction by:

- Gender
- Ethnicity
- Disability
- Age (using the National Student Survey)

The proportion of students on full/partial/nil grants who are:

- Female
- From an ethnic minority background
- Disabled
- Mature (using linked ILR-HESA data)

Where possible, part-time study shall be separated out from full-time study.

The changes will be implemented from Academic Year 2012/13 onwards. As in 2006/07, we may expect an anticipation effect in 2011/12 so the baseline for monitoring the changes will be Academic Year 2010/11. Any possible impacts on participation and the composition of the student body will be picked up from 2012/13 onwards. Impacts on the student experience and outcomes will become available much later.

This Equality Impact Assessment is available electronically at www.bis.gov.uk/equality-impact-assessments .

Where possible, we will make other versions of this document in Braille, other languages, or easy read available on request.

Annex

List of organisations consulted

The Browne Review (on which our proposals are based) supported in its work by an Advisory Forum made up of 22 groups representing the interests of students, school leavers, graduate recruiters, institutions, academics and business. The Advisory Forum met five times during the course of the Review to engage in detailed debate on its key issues. Its membership is detailed below:

- 1994 Group
- Association of Colleges
- Association of Graduate Careers Advisory Services
- Association of Graduate Recruiters
- BMA Medical Students Committee
- British Academy
- British Youth Council
- CBI
- Guild HE
- HEFCE
- Million+
- National Student Forum
- NUS
- OFFA
- RCUK
- Royal Academy of Engineering
- Russell Group
- SKILL
- UCAS
- University Alliance
- University and College Union
- Universities UK

The Review also received 90 submissions to its Call for Evidence (which ran from 7 December 2009 to 31 January 2010) and 65 submissions to its Call for Proposals (which ran from 15 March to 14 May 2010). These are available on the Review's website. The Review Panel also held two sets of public hearings to cross examine evidence from expert witnesses about the strengths and weaknesses of the current higher education system, and about their proposals for reform. The first set of hearings was held in Manchester and London, the second in Bristol and Leicester. Videos of these hearings are available on the Review's website. The list of witnesses interviewed by the Browne Review is included below:

- 1994 Group (Prof Paul Wellings)
- Association of Colleges (Pat Bacon)
- Birkbeck (Prof David Latchman)
- Birkbeck (Prof Claire Callender)
- British Library & HEPI (Genevra House)
- CBI (Richard Lambert)
- CIHE (David Docherty)
- GuildHE (Alice Hynes)
- HE Academy (David Sadler)
- HEFCE (Sir Alan Langlands)
- Imperial College Business School (Prof Jonathan Haskel)
- Institute of Education (Prof Anna Vignoles)
- Institute of Fiscal Studies (Alissa Goodman)
- Institute of Fiscal Studies (Prof Lorraine Dearden)
- LSE (Prof Nick Barr)
- Million+ (Pam Tatlow)
- NUS (Wes Streeting)
- NUS (Aaron Porter)
- NUS (Dr Debbie McVitty)
- NUS (Graeme Wise)
- OECD (Prof Dirk Van Damme)
- OFFA (Prof Sir Martin Harris)
- OFFA (Chris Scrase)
- OFFA (David Barrett)
- Open University (Martin Bean)
- Oxford University (Prof Herb Marsh)
- Oxford University (Prof Neil Shephard)
- QAA (Anthony McClaran)
- RCUK (Prof Alan Thorpe)
- Russell Group (Dr Wendy Piatt)
- Former Secretary of State for Education & Skills Rt Hon Charles Clarke MP
- Teeside University (Prof Graham Henderson)
- UCU (Sally Hunt)
- UKCES (Chris Humphries CBE)
- University Alliance (Prof Andrew Wathey)
- UUK (Prof Steve Smith)
- York University (Dr Paul Wakelin)

Many of the groups consulted by the Browne Review have an interest in equality matters. In terms of direct representation, SKILL represents disabled students, the NUS and National Student Forum have a key interest in equality concerns for students, and the University and College Union for staff (and supports equality of opportunity for students).

The opinion of the Equality Challenge Unit has been sought in the preparation of this assessment but comments had not been received at the time of publication.

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