Consultation on postgraduate doctoral loans

Analysis of consultation responses

March 2017

Pye Tait Consulting
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1. Executive Summary

1.1 Introduction

The Government intends to introduce an income-contingent loan for doctoral study from the academic year 2018-19. Its objectives in doing so are to:

- Support take-up in doctorates by providing access to finance to those not currently in receipt of a Research Council studentship;

- Broaden and strengthen the UK’s research base; and

- Benefit the economy by increasing the supply of workers with the high level skills needed to meet demand, and to stimulate an innovation-led economy.

The Government launched a public consultation from 4th November 2016 to 16th December 2016. This sought views on the terms of the loan, including eligibility requirements and matters relating to implementation.

The consultation generated 318 total responses. The majority (222) were individuals and the remaining 96 represented different types of organisations. These comprised 73 universities (including representative bodies), 12 student bodies, four research-focused organisations (including learned societies) and a small number of other organisations.

Consultation respondents generally welcomed the postgraduate doctoral loan proposals. Detailed feedback from respondents provides an opportunity for the Government to give further consideration to key technical details, the implications for implementation, and offer greater clarity may be needed.

1.2 Individual Eligibility

1.2.1 Age Restriction – 59 and Under

The Government intends for the loan to be available to individuals aged 59 and under (on the first day of the first academic year of their course). Almost two thirds of consultation respondents (65%/201 respondents) agreed that some form of age restriction would be appropriate. This included support from 83% (53) of responding universities.

The proposed age cap of 59 was generally viewed as a reasonable and fair compromise between widening access to doctoral study and minimising the risk to the tax payer of non-repayment and associated low value for money. Among the remaining respondents not in favour of an age restriction, a common view was that education and lifelong
learning should be accessible to everyone, and that an age cap would be inherently “discriminatory”.

1.2.2 Studying for personal benefit

The consultation asked whether the loan could incentivise study that is purely for personal benefit. More than half of consultation respondents (60% / 186 respondents) did not believe this would be the case and it was generally felt that doctorates are a huge undertaking and not entered into lightly. Among the minority who believed that the loan could incentivise purely personal study, there was widespread acknowledgement that this would be relatively rare, that little could be done to avoid such an outcome, and that even those studying for personal benefit would create value through the very nature of their doctoral research.

1.2.3 Possibility of capping loan places

Respondents were asked if they had any views on the idea of introducing a capped number of doctoral loan places per Higher Education Institution, in particular the option of using HEFCE’s allocation of Research Degree Programme (RDP) supervision funding as a metric for determining loan allocations to institutions. Almost all responding organisations disagreed on the basis that this could limit opportunities for widening participation in postgraduate education, stifle smaller and more specialised institutions, and be difficult to implement, especially for institutions in the devolved administrations. The small minority of organisations in favour of such a measure referred to existing evidence that pointed to postgraduate training being most effective and of the highest quality where it is concentrated in the highest quality research environments.

1.3 Course Length

1.3.1 Course length

The consultation asked whether six years would be a sufficient amount of time to enable the completion of a doctorate, particularly for those undertaking part time study.

The majority of respondents (71% / 222 respondents) agreed with the Government’s proposal, although views varied considerably between respondent groups. While the majority of individuals agreed, universities were evenly divided in their views. The majority of student bodies and research-focused organisations did not believe that six years would be sufficient for all students.

Of the 64 universities responding to this question, 34 suggested longer alternative lengths, equally divided between those saying seven years and those saying eight years.
Five of the twelve responding student bodies also suggested either seven or eight years. The main justifications from these organisations were as follows:

- Progression is not straightforward and each student’s circumstances can be different, for example if affected by maternity, ill health, caring responsibilities, bereavement etc.;

- Some universities already have their own policies in place which allow part time study for up to eight years; and

- Research Councils UK (RCUK) policy on part-time students states that a minimum of 50% full-time effort is required, so a four-year programme could take up to eight years rather than six, therefore the new loan should arguably follow suit.

1.3.2 Ensuring timely completion

Respondents were invited to suggest what could be done to ensure that students are able to complete their courses within the set time. A common suggestion was for regular attendance and progress monitoring by institutions, and that this data could potentially be shared with the loan funder to permit payments in tranches. A minority of universities and student bodies felt it important that students are given the flexibility and autonomy to determine what funding they need, and how much they should be able to draw on at different points during their study.

1.3.3 Benchmarks for measuring course length

The consultation sought views on whether the measure for defining course length should be based on submission of the thesis or another, alternative benchmark. Almost three quarters of respondents (74%/230 respondents) favoured using submission of the thesis as the benchmark.

The main justifications were that this would be a clear, practical and measurable end point for work having been completed; a benchmark over which students can realistically exercise control; and that there would be a “reasonable expectation” of students securing a qualification within the subsequent six months of submission.

The minority of respondents in favour of an alternative approach argued that the loan length should be extended to include the examination and correction period as this could require “major revisions” and potentially take several months to a year to complete. They made the point that some students would still require financial support during this time.

1.3.4 Factors affecting course completion

Consultation respondents were keen to point out that factors affecting doctoral completion are often complex and not necessarily mutually exclusive, such as finance,
employment, wellbeing and health issues. Individual respondents cited financial difficulties as the biggest influencing factor for doctorates not being completed, whilst organisations were less inclined to highlight any one single barrier over another.

1.4 Course Eligibility

1.4.1 Views on course eligibility

Almost all consultation respondents strongly agreed with the Government’s proposal for all Level 8 doctoral degrees to be eligible for the proposed loan. They believed this would create a level playing field between subjects and disciplines that they viewed as equally important in the context of high quality research and knowledge advancement. From an operational perspective, respondents felt this would make the loan much easier for institutions to manage, maintain, and be simpler for students to understand.

A small minority of respondents questioned whether PhD by Published Work qualifications should be eligible for loan funding, along with those professional doctorates which attract high levels of funding from other sources, such as the NHS.

1.4.2 Interaction of master’s and doctoral loans

The consultation asked whether respondents foresaw any practical implications from the interaction of the loan for taught master’s study and the proposed loan for doctoral students. A key point which emerged from responses was that universities manage progression between master’s and doctoral courses differently and that a variety of different arrangements can operate within one institution depending on the subject area. Six respondents raised concerns that ‘integrated’ applicants (i.e. those embarking on a master’s course with the intention to progress and exit with a doctorate) could be financially disadvantaged given that they would only be eligible for the doctoral loan.

1.5 Funding and Repayments

1.5.1 Meeting additional costs

Respondents were asked how institutions and other organisations might provide new and innovative packages of support to help meet those costs of study which are not covered by the proposed loan. Universities generally suggested that new loan would encourage them to consider how to combine funding approaches and look at new partnership opportunities. Four made the point that existing modes of financial support that they offer, such as scholarships, would continue unchanged.
1.5.2 Duplicate funding

Apart from Research Council studentships and fees-only awards, consultation respondents were asked how other sources of public funding should be treated when considering whether a student should be eligible for the proposed loan.

Half of the 60 universities responding to the consultation expressed concern around the proposed exclusion of students in receipt of Research Council studentships, particularly fees-only students who could be “disadvantaged” when compared to those obtaining other grants or bursaries from other sources. A minority of concerns were also raised around the potential administrative complexity of determining which other types of public funding a prospective student has applied for, with clarity needed on how this would be undertaken. A small minority of respondents questioned how the Government was defining ‘public money’ in this context, for example whether this would include funding from public sector employers (such as the NHS), university scholarships, charities etc.

Individual respondents were more diverse in their views, with some of the opinion that the new loan should only support those most financially disadvantaged, that it should not be offered to those in receipt of other public funding, and that the loan amount could potentially be ‘adjusted’ where a student already has Research Council or other funding.

1.5.3 Meeting repayments

Just under half of respondents (43%/134 respondents) believed there could be additional impacting factors from a student taking out a doctoral loan on top of a master’s loan. The repayment terms were generally described by respondents as simple, fair and appropriate, particularly the approach of combining master’s and doctoral loans into a single payment and calculating repayments at 6% of income. A small minority of respondents raised wider concerns around the compounding effect of multiple loans (undergraduate, postgraduate and doctoral) and rising levels of indebtedness.

1.6 Impact on Employers and Businesses

Almost all consultation respondents (95%/300 respondents) believed the loan would offer benefits to employers, with such advantages including increased supply of specialist knowledge, increased supply of high level skills, increased innovation, followed by increased employability.

1 NB: There were no consultation respondents answering on behalf of their organisation in the category of ‘employer. Views on the likely business impact have therefore been drawn from other groups and should be treated with caution.
1.7 Wider Considerations

A small minority of respondents pointed out that individuals with certain protected characteristics could be negatively affected by the proposed loan, particularly in relation to age, gender, disability, race, and religion and belief.

1.8 Conclusions

The detailed feedback from consultation respondents provides the Government with an opportunity for further consideration of certain technical details and the potential implications of introducing the loan for doctoral study.

The main conclusions from the consultation analysis are set out below, with further detail behind each conclusion provided in section 9.

1. The age restriction of ‘59 and under’ appears to be fair and strikes an appropriate balance between enabling the broadest possible access to doctoral study and mitigating the risk of non-repayment;

2. The doctoral loan is unlikely to incentivise large numbers of students to study purely for personal benefit;

3. There is little support for the Government’s alternative proposal of capping the number of doctoral loan places per institution;

4. The proposed maximum course length of six years would benefit students who need to study part-time. Additional flexibility may be needed for some students and, according to more than 30 universities, the Government should consider extending the loan length to seven or eight years;

5. To ensure timely completion of doctoral programmes, universities are generally favourable to the idea of reporting students’ progress as a trigger for loan payments, however, the frequency of progress reporting frequencies currently vary between institutions;

6. There is strong support among respondents for the loan to be available for all Level 8 doctoral degrees;

2 These matters, along with other strategic, operational and equality considerations for the loan, are set out in section 8.
7. The proposed approach of basing loan eligibility on a student’s qualification intentions appears to be sensible, but would need clear guidance and FAQs for applicants;

8. The loan ought to complement other forms of public and private funding for doctoral programmes, in the interests of ensuring choice for students; and

9. The value added by the new doctoral loan should outweigh any negative implications associated with rising levels of student debt and pressures on institutional resources.
2. Introduction

2.1 Background

The Government is committed to increasing the strength of the UK’s research base, including postgraduate education. A highly skilled, research-driven workforce is important for innovation and economic growth, and doctoral graduates help to foster innovation through collaboration and engagement with universities. Doctoral graduates are also a valued commodity to industry, with three quarters of previously surveyed employers indicating that losing them would have either a business critical, or significant impact, on operations.

In its consultation document on postgraduate doctoral loans, the Department for Education (DfE) set out five main reasons to explain the proposed introduction of a postgraduate doctoral loan:

1. Addressing employer demand for high level skills, based on the rationale that the economy needs a highly skilled, research-driven workforce to enable businesses to grow, innovation to thrive, and to remain a global research leader;

2. Unmet student demand for places on doctoral programmes, noting that in 2014/15 around 37% of students beginning doctorates who met the residency requirements for a Research Council maintenance stipend received one;

3. Addressing demand from higher education institutions (HEIs), noting that they see doctoral students as strategically important to their research capacity and output;

4. Broadening and strengthening the research base, intending to allow a broad range of institutions to strengthen their research programmes; and

5. Closing the financial gap for individuals, noting that course fees may vary by institution, subject or location, as well as variations by geography in the cost of living.

At Budget 2016, the Chancellor announced the Government’s intention to launch a technical consultation on the detail of the proposed doctoral loan. The key terms of the proposed loan were set out as follows:

______________________________

3 CFE Research (2014) *The Impact of Doctoral Careers*
4 Ibid. [2014 survey]
Eligible individuals would be able to borrow up to £25,000;

- The maximum course length would be six years;
- The loan is intended as a contribution to the cost of study, rather than to specifically cover tuition fees or living costs;
- The loan would be available to individuals studying any Level 8 doctoral qualification;
- The loan would be available to eligible students who are not in receipt of a Research Council studentship5 (including fees-only awards);
- Eligible students ordinarily resident in England would be able to take their loan to any UK university offering a doctoral programme.

The loan is expected to be available from the academic year 2018/19 to eligible UK nationals ordinarily resident in England and other students that meet the loan’s eligibility and residency requirements in place at the time.

5 A studentship is funding given to a student by a research organisation to undertake postgraduate training. Some studentships include funding for fees as well as a stipend for maintenance, whereas others are fees only.
2.2 Handling of Consultation Responses

The Government launched a public consultation from 4\textsuperscript{th} November 2016 to 16\textsuperscript{th} December 2016, to seek views on the specific details of the proposed doctoral loans. The consultation focused on the loan terms, including eligibility criteria and matters relating to implementation. This report presents the findings from the consultation.

The Government’s consultation document explained the technical proposals for the loan and included a questionnaire for individuals or organisations to complete and return. In addition, or as an alternative to completing the questionnaire, the Government invited free-format responses such as letters and supporting documentation.

All responses were directed to, and handled by, the DfE and securely shared with Pye Tait Consulting for independent analysis and anonymous reporting in line with the Data Protection Act 1998 and Market Research Society (MRS) Code of Conduct.

The consultation generated 318 responses. Of these:

- 309 were received via the DfE’s online questionnaire;
- 2 were received as Word/PDF versions of the consultation questionnaire (either with or without additional or supporting information); and
- 7 consisted of purely free-format correspondence (such as emails and letters).

2.3 Respondent Profile

Responses were received from a range of perspectives, with the vast majority being individuals (222), and the remaining 96 representing different organisations (Table 1).

Of 222 individual (i.e. non-organisation) respondents, 110 categorised themselves as ‘current students’, 66 as ‘prospective students’, and the remainder as other individual respondents.
Table 1 Respondents by category

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>318</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>222</td>
</tr>
<tr>
<td>Universities, including representative bodies&lt;sup&gt;6&lt;/sup&gt;</td>
<td>73</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>12</td>
</tr>
<tr>
<td>Research-focused organisations (including learned societies and professional bodies)</td>
<td>4</td>
</tr>
<tr>
<td>Others&lt;sup&gt;7&lt;/sup&gt;</td>
<td>7</td>
</tr>
</tbody>
</table>

2.4 Analysis and Reporting

The purpose of the consultation analysis was to identify emerging themes, concerns and any unintended consequences from the Government’s proposals. Many of the consultation responses (particularly those representing organisations) were detailed in nature, offering a range of views, including alternative ideas and suggestions to those set out within the Government’s proposals. As such, it has not been possible for the analysis to provide an exhaustive or verbatim account of all feedback, nor have we been asked to investigate the reliability of quoted sources of evidence.

Each section of this report begins with a summary of the Government's main consultation proposal. Where applicable, the results of ‘yes/no’ or ‘multi response’ questions are shown in tables<sup>8</sup>, followed by textual analysis of respondents’ views, opinions and...

<sup>6</sup> A total of 64 universities and 9 university representative bodies responded to the consultation

<sup>7</sup> Respondents classified as ‘Other’ include an industry association (1), a college group (1), a postgraduate information and advice service (1), consumer representative groups (2) and registered charities/not-for-profit organisations (2).

<sup>8</sup> The tables showing results to the ‘yes/no’ and multi-response questions are preceded by the question number and question text from the consultation document (paraphrased where appropriate).
supporting evidence. Not all respondents addressed all aspects of the consultation, therefore the base numbers for each consultation question differ and are stated where applicable throughout this report.

The vast majority of consultation responses are based on the views and opinions of individuals and informed by the best of their available knowledge and by their values and perceptions. A minority of respondents, especially some universities, referred to other sources of evidence such as their own internal survey findings that are not necessarily in the public domain. It has not been possible to verify the reliability and robustness of these sources within the scope of this consultation analysis and the report presents the main arguments at face value, with specific examples included by way of anonymised quotations, where appropriate. No attempt has been made to offer contextual facts or alternative arguments to the content of individuals’ responses.

As part of the analysis, care has been taken to identify any notable differences of opinion within and between respondent groups (as defined by Table 1, above).

Overall, perceptions were mixed within and between respondent groups, meaning that it cannot be said for example that one group holds views that may be considered significantly different to another group.
3. Individual Eligibility

3.1 Age Restriction – 59 and Under

From the consultation document: Restricting the availability of the loan to those aged 59 and under is intended to tackle the potential problem of low value for money, associated with lending large amounts of public money to cohorts of students who are unlikely to enter repayment.

Do you think that an age eligibility restriction is a proportionate way of mitigating this risk?

Almost two thirds of respondents (65%) agreed that some form of age restriction would be a proportionate way of mitigating the risk of low value for money. Universities and student representative bodies (including Students’ Unions) were the most favourable groups with more than three quarters believing that this approach would be appropriate (Table 2).

Table 2 Is an age eligibility restriction a proportionate way of mitigating the risk of low value for money?

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>310</td>
<td>65%</td>
<td>35%</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>59%</td>
<td>41%</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>83%</td>
<td>17%</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>11</td>
<td>73%</td>
<td>27%</td>
</tr>
<tr>
<td>Research-focused organisations (including learned societies and professional bodies)</td>
<td>4</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>75%</td>
<td>25%</td>
</tr>
</tbody>
</table>

Views of the majority of respondents in favour of an age eligibility restriction

The proposed age cap of 59 was generally viewed as a reasonable and fair compromise between widening access to doctoral study and minimising the risk to the tax payer of non-repayment and associated low value for money.

A research-focused organisation advocated the use of an age restriction as a proportionate way of mitigating risk, pointing out that the numbers of studentships in the 60-plus age category was “extremely low”. The organisation did not support lowering the
age cap any further as that could exclude students of an age where they could make a “significant contribution” to research and practice after completing their course, especially those studying full-time.

Several universities observed that the proposal aligned with the age cap for the recently introduced Government loan for taught master’s study, and saw no reason for introducing alternative principles with respect to doctoral programmes.

While most student representative bodies emphasised the importance of lifelong learning (and referred to “strong evidence” of the economic, social and health benefits of learning at all ages), they acknowledged that providing doctoral loans to individuals over the age of 59 would not be the most cost-effective means of doing so.

The most common argument from the majority of individuals in favour of an age cap was that it would be “unrealistic” to expect those over the age of 59 to go on to earn enough to repay the loan in full. Also that:

- The public purse cannot reasonably support everyone who would like to undertake a doctoral programme of study;
- Some doctoral graduates could face financial difficulties if having to repay a large loan when they reach retirement; and
- Older applicants are more likely to be in a position to self-fund a doctoral qualification and therefore be less in need of public support than younger students.

“We think that an age limit of 59, or potentially lower, would provide reassurance that beneficiaries will have the opportunity to contribute their new knowledge and skills for the public benefit, including contributions to the Government’s social and economic goals.”

University

“We were very clear in our evidence against the age cap of 30 on [postgraduate taught master’s] loans and were pleased that the Government raised the cap to 60. It would seem reasonable to maintain the same eligibility for doctoral loans.”

Student representative body

“Younger age restrictions would both raise the prospect of being discriminatory, and run the risk of preventing older and more experienced people being able to make their expertise available to others through the medium of a doctoral degree. The proposed age limit is a reasonable balance.”

Not-for-profit organisation
“It is the youngest graduates that will have the most difficulty funding their studies and paying for their living costs.”

Individual respondent

**Views of the minority of respondents not in favour of an age eligibility restriction**

Among the minority of respondents not in favour of an age restriction, a common view was that education and lifelong learning should be accessible to everyone, and that an age cap is inherently “discriminatory”.

A minority of universities expressed concern about the introduction of an age cap and gave the following main reasons:

- Whilst it makes sense if the priority is to mitigate the risk of defaulting on repayment, it does not sit comfortably with the missions of institutions who wish educational opportunities to be available to all; and

- Irrespective of age, doctoral students by definition are contributing to knowledge, expanding and strengthening the research base even before they complete their doctoral award.

A learned society suggested that older doctoral students, who have a wealth of professional experience behind them, may be able to attract a comparatively higher salary, thus minimising the risk of non-repayment.

The minority of individual respondents arguing against an age restriction mentioned that an overall cap of 59 seemed somewhat arbitrary given an aging population and higher earnings potential for older/more experienced workers in certain disciplines, especially those who continue to work beyond state pension age.

“It is important to note that in a number of disciplines, for example, social work, experience in practice is often a pre-requisite for undertaking a PhD and therefore encourages applicants in later career stages.”

Research-focused organisation

“[Our institution] has had between 15 and 28 full and part-time [doctoral] students over 50 entering in each of the four years from 2012/13 to 2015/16. This represents between 3.6% and 7.4% of the headcount in each intake. We would not want to introduce inequalities in their ability to engage in this area of study based purely on their age.”

University
3.2 Age Restriction – Possible Options

Respondents were asked which age eligibility restriction they feel would best achieve the Government’s aims. Just under two thirds of universities (64%) and a similar proportion of student representative bodies (67%) agreed with the proposal that ‘age 59 and under’ is the most appropriate restriction. Individual respondents were more varied in their views (Table 3).

Table 3 Which age eligibility restriction would best achieve the Government’s aims?

<table>
<thead>
<tr>
<th>Base</th>
<th>59 and under</th>
<th>49 and under</th>
<th>39 and under</th>
<th>29 and under</th>
<th>Another age eligibility restriction</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>294</td>
<td>38% (112)</td>
<td>19% (55)</td>
<td>6% (17)</td>
<td>0% (1)</td>
<td>6% (17)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>204</td>
<td>27% (55)</td>
<td>23% (47)</td>
<td>8% (16)</td>
<td>1% (1)</td>
<td>7% (14)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>64% (45)</td>
<td>9% (6)</td>
<td>1% (1)</td>
<td>-</td>
<td>4% (3)</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>12</td>
<td>67% (8)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>50% (2)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>50% (2)</td>
<td>50% (2)</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Respondents preferring the 59 and under age restriction believed this would strike a good balance between promoting value for money and addressing the demand for research skills from employers and the academic research base.

Respondents preferring a lower age cap argued that this would allow a better level of employment service before retirement and would increase the chances of the loan being repaid. Several individual respondents commented that more emphasis should be placed on maximising opportunities for young people who are less likely to have accrued
personal savings, as well as to maximise value for money through a comparatively longer period in employment.

“Many students return to study later in life to assist with their professional development. A lower age limit would exclude many students from accessing these loans.”

Student representative body (answer “59 and under”)

“I’ve just started my self-funded PhD at age 33 and I think it is reasonable to expect that funding should finish between age 40-50 where a real contribution to their chosen field/employment can still be achieved i.e. 20-30 years.”

Individual respondent (answer “49 and under”)

“We suggest a limit of 39 and under would allow for mature individuals to join the profession having followed a different career path, and at the same time to pay back the loan during a reasonably full working life.”

University (answer “39 and under”)

### 3.3 Studying for Personal Benefit

**From the consultation document:** The government is aware that some doctoral students may undertake study purely for personal benefit, with no particular intention to undertake further employment or research. A £25,000 income contingent loan may particularly incentivise this in older cohorts, as they are less likely to enter repayment. Whilst we recognise the value of doctoral study in and of itself, there is a risk that funding students who have no intention to undertake further employment or research would offer low value for money to the taxpayer.

In your view, is this loan likely to incentivise this kind of study?

More than half of consultation respondents (60%) did not believe that the proposed loan would incentivise study purely for personal benefit. This majority view was shared by individual respondents, universities and student representative bodies alike. Three out of the four research-focused organisations felt that the loan would incentivise study in this way, at least to some extent (Table 4).
Table 4 Is the loan likely to incentivise study that is purely for personal benefit?

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>All respondents</strong></td>
<td>310</td>
<td>40% (124)</td>
<td>60% (186)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>40% (88)</td>
<td>60% (133)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>40% (28)</td>
<td>60% (42)</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>11</td>
<td>36% (4)</td>
<td>64% (7)</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>75% (3)</td>
<td>25% (1)</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>25% (1)</td>
<td>75% (3)</td>
</tr>
</tbody>
</table>

Views of the majority of respondents stating that they did not believe the loan would incentivise study purely for personal benefit

The most common view shared by these organisations and individuals, was that a doctoral programme of study would be a huge undertaking, which would not be entered into lightly. Several universities and two university representative bodies noted that the proposed maximum loan amount would inevitably need to be supplemented by funding from other sources. They therefore argued that, for most students, doctoral research would only be pursued by candidates seriously considering further employment/research.

One university referred to the findings of its own recent survey, in which only 8% of respondents who accepted an offer to study at postgraduate research level said that career and employability was not a factor in their decision; furthermore 93% said that the reputation of the university to improve their earnings potential and advance their career, “mattered to them”. Another university also commented that, in their experience, the number of students studying for personal benefit is “very low”.

“We consider it unlikely that there will be significant numbers of students undertaking the serious personal commitment of a research degree programme over several years without the intention to make use of the skills and knowledge acquired in future.”

Postgraduate information and advice service

“A minority of students would [study purely for personal benefit], however most mature students would be looking to enhance their career and marketability so would enter into work or a field where they would be required to repay the loan.”

Individual respondent
Views of the minority of respondents stating that they **did** believe the loan could incentivise study purely for personal benefit

It is important to note that those respondents who answered 'yes' to this question, generally did so even where they believed that studying for personal benefit would only occur in a minority of cases.

A research-focused organisation acknowledged that whilst it is “possible” that the loan could incentivise those who wish to study for personal benefit, they stressed that this was not based on any underpinning evidence.

Several respondents questioned the definition of ‘value for money’ and were keen to emphasise the wider benefits of doctoral research to society. One university commented that a doctoral student may be developing research in strategically, economically and/or socially important area of research and teaching, and failure to nurture this would reduce the broad-reaching approach and value of many disciplines.

“Some older students might take the loan on the basis that they will never have to repay it, but since they would still have a substantial funding gap to cover all the costs of their course, it is unlikely this behaviour would be widespread.”

*University*

“There could be situations where the value of the research conducted outweighs the financial outlay; it depends how you quantify ‘value’”.

*Individual respondent*
3.4 Possibility of Capping Loan Places

From the consultation document: We are considering an alternative to a demand-led product which would make the loan available only at institutions that have been allocated a capped number of doctoral loan places. The number of loans allocated to institutions would be made according to an existing metric. One option would be to allocate loan places in proportion to HEFCE’s allocation of Research Degree Programme (RDP) supervision funding, with the allocation capped at a maximum number of places. Institutions would decide which of their students to offer loan places to, and would need to remain within their allocation.

Do you have any views on using this metric as the basis for such an allocation, or on the level at which allocations to institutions should be capped?

Most organisations provided a response to this question, with a research-focused organisation and student body feeling that the purpose of such a cap and the process of administering loan allocations was not sufficiently clear from the consultation. A total of 51 individual respondents out of 222 felt unable or unqualified to answer on this topic.

Almost all respondents disagreed with capping the number of loan places, with only a small minority in favour. As the consultation put this proposal forward as an “alternative to a demand-led product”, respondents who disagreed did not tend to offer further unprompted ideas here about how value for money could be assured, and instead queried the need for such additional control mechanisms per se.

See section 3.5 for a summary of additional value for money suggestions.

Views of the vast majority of respondents who disagreed with the idea of capping loan places allocated to institutions:

The following views primarily relate to the perceived implications from using the proposed metric rather than the idea of capping the number of loan places per institution. In other words, if an alternative approach were to be suggested that did not result in the same potential implications, it is possible that respondents may have held a different view.

A key concern raised by universities, representative bodies and learned societies was that if the majority of funding were to be channelled to more research intensive institutions, this could limit choice for students, particularly for those less socially mobile. Another common concern was that this approach could have a stifling effect on smaller and more highly specialised institutions that are successfully growing and expanding their research portfolio.
The proposed approach was viewed as potentially costly and bureaucratic to administer, with institutions potentially having to design eligibility criteria, decision making processes and an appeals process, which could all lead to prolonged application timescales. Linked to this, it was noted that the metric is only applicable to institutions in England, yet the loan is intended to be portable to institutions across the UK. As such, the implication was that an alternative mechanism might be needed for the devolved nations.

Three organisations pointed out that, as doctoral students can enrol throughout the academic year, unless an institution failed to fill all its allocated places in September/October, this could disadvantage students choosing start at a later date.

A student body questioned the current algorithms used to determine RDP supervision funding as a suitable indicator for the quality of research degree provision, and that, in their view, there is “no clear evidence” of a correlation between the measurement of research quality in the Research Excellence Framework (REF) and the quality of research degrees.

Individuals disagreeing with the Government’s proposal generally focused on the potential impact of limiting choice for doctoral students and the risk of weakening less well established institutions.

“Post-92 universities traditionally have excellent links with industry – and high-quality industrially-funded ‘applied’ research – but do not always have the associated ‘research power’ of larger HE institutions. The proposed approach has the potential to stifle developing links with industry in important and rapidly developing research areas.”

University

“High quality support for doctoral studies is available at a wide range of institutions, far beyond just the Russell Group.”

Individual respondent

Views of the small minority of respondents who agreed with the idea of capping loan places allocated to institutions:

A small minority of respondents favoured the idea of introducing an institutional cap on loan places in the interest of supporting high quality doctoral projects within strong research environments. A university pointed out that HEFCE’s allocation recognises where investment is made in doctoral education on the basis of quality indicators, and
referred to “persuasive evidence”\(^9\) suggesting that postgraduate training is most effective and of highest quality where it is concentrated in research-intensive universities.

Reference was also made to the 2010 Smith Review on postgraduate study for the former Department for Business, Innovation and Skills, which stated: “To get the best value from limited resources, public funding that supports postgraduate research students should also be targeted in areas of excellence. This will help to sustain our most successful research centres and ensure that research students are located in stimulating environments where world-leading research is taking place.”

A small minority of individual respondents felt that use of the RDP could have merit, notably that fewer loan-funded places and greater competition might increase the quality of applicants and the overall quality of research. Some believed that only the ‘best’ universities should be supported, while others thought that institutions which traditionally struggle to enrol students should be given priority.

### 3.5 Ensuring Value for Money

**From the consultation document:** Other than an age eligibility restriction, can you propose any other ways of mitigating the associated value for money issues?

Half of student representative bodies, 2 research-focused organisations and 36 individuals did not comment on this question.

Suggestions from organisations were many and varied, with the most common being to monitor the progress of students as a condition of their loan payment to ensure high completion rates. Two mentioned the idea of a means testing measure for allocating loans, although they disagreed as to whether or not the administrative costs would outweigh the savings of excluding those with the capability to self-fund.

Another suggestion was to prioritise the availability of loans in subject areas considered to be of high demand and high social, cultural and economic value (although another university mentioned that there is good evidence that a doctoral qualification makes graduates “highly employable across a range of disciplines”).

The most common suggestions from individuals were to introduce some kind of means testing, prioritise loans for high-demand or under-subscribed subject areas, and limit access depending on prior academic attainment level.
4. Course Length

4.1 Availability of the Loan for Six Years

From the consultation document: Does making the loan available for courses of up to six years give a sufficient amount of time to enable part-time study, whilst also incentivising students to complete their doctorates within a set period of time?

On average, almost three quarters of respondents (71%) believed that six years would be appropriate. In particular, 81% of individual respondents agreed with the Government’s proposal. Universities were equally split their views, while the majority of student bodies and research-focused organisations did not believe that six years would allow sufficient time for some part time students to complete their course (Table 5).

This question saw the largest difference between the views of Russell Group and non-Russell Group universities. Of 15 Russell Group universities responding to the consultation, just over a quarter (27%) believed that six years would be sufficient time, compared with more than half (58%) of non-Russell Group institutions\(^{10}\).

<table>
<thead>
<tr>
<th>All respondents</th>
<th>Base</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>311</td>
<td>71% (222)</td>
<td>29% (89)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>81% (179)</td>
<td>19% (42)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>50% (35)</td>
<td>50% (35)</td>
</tr>
<tr>
<td>Student representative bodies (including Students' Unions)</td>
<td>12</td>
<td>33% (4)</td>
<td>67% (8)</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>25% (1)</td>
<td>75% (3)</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>75% (3)</td>
<td>25% (1)</td>
</tr>
</tbody>
</table>

\(^{10}\) The Russell Group comprises 24 universities in the UK which are considered to be ‘research intensive’ institutions. The Russell Group aims to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.
The majority of individual respondents and a minority of universities and student representative bodies commented that a six year timescale would be “reasonable”, and would incentivise part time students to complete within the set timescale if made clear to them at the outset.

The majority of universities and student bodies, along with a minority of individuals, advocated a longer period for the loan. A total of 34 universities suggested longer alternative lengths; they were equally divided between those suggesting seven years and those suggesting eight years. Five student bodies also suggested either seven or eight years. Justifications are as follows (ordered from most to least cited):

- Progression is not straightforward and each student’s circumstances can be different, for example factors such as maternity, ill health, caring responsibilities, bereavement can mean that more time may be needed to complete the programme of study;

- Institutions have their own regulations in place stipulating expected study periods for doctoral programmes which are considered “appropriate” and “realistic”, and it would not be appropriate to shorten those purely to meet loan eligibility criteria; and

- RCUK policy on part-time students states that a minimum of 50% full-time effort is required, so a four-year programme could take up to eight years rather than six, therefore the new loan should arguably follow suit.

“Intensity of study is difficult to measure for part time students… a balance needs to be struck in the design of the loan between incentivising speed of completion, while ensuring that those who may unexpectedly need to take longer are adequately supported.”

*University representative body*

“What would need to be made clear are the consequences of the student not submitting within the six year period, since our regulations allow an additional year of contingency.”

*University*

“Whilst only small numbers of part-time students currently go past six years (currently 50 doctoral students beyond six years at our institution) if the issue is compounded nationwide it is likely that a large number of students would be affected. As the completion year is one of the most stressful years for a doctoral students, it is advisable that funding is extended to those students who have gone into their 7th year”.

*Student representative body*
"I think that the initial aim should be less than six years, but the actual completion time may need to be more flexible for part time students by accounting for breaks in study etc."

_Individual respondent_

### 4.2 Ensuring Timely Completion

Respondents were invited to suggest what could be done to ensure that students complete their courses within the set time, so that payments are not made in advance of need should they take longer than intended, or longer than the six year course limit.

The most common suggestion from several universities was that loan payments should be made to each student in tranches, subject to confirmation from the institution to the funder that the student has made adequate progress. Respondents indicated that reporting frequencies can vary between institutions (typically either six-monthly or annually). In line with this suggestion, a learned society recommended adopting the same model used by RCUK whereby funding ceases at the end of year one if insufficient progress has been made.

Several institutions and student bodies emphasised the problem that doctoral study cannot be clearly scheduled, and small minority of organisations preferred the idea of students being given the flexibility and autonomy to determine what funding they need and how much to draw down at different points during their study.

One university suggested that students should state the amount of time they intend to take to complete their course when applying for the loan so that payments can be scheduled accordingly, possibly subject to registration checks prior to payment. Another suggested linking loan payments to key milestones in the doctoral journey e.g. proposal, transfer and thesis submission. In line with this, short intervals between payments might minimise the risk of overspend.

Individuals responding to this question gave a range of suggestions such as annual, six monthly or quarterly payments. Many supported the idea of payments being made based on the reporting of satisfactory enrolment, progress or staged completion of their doctorate.

"There needs to be a clear definition of when students are eligible to take out the loan. Active periods of research can be followed by periods of extension and lengthy examination periods."

_Student representative body_
“Without monitoring approaches… there is a risk that students in receipt of a loan will not complete their doctoral studies in a timely manner.”

Research-focused organisation

4.3 Benchmarks for Measuring Course Length

The consultation sought views on whether the measure for defining course length should be based on submission of the thesis or another, alternative benchmark. Almost three quarters of respondents (74%) favoured submission of the thesis. Similar majorities applied with respect to all groups except student representative bodies (Table 6).

Table 6 Should the limit on course length refer to the thesis submission or another benchmark for completion?

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Thesis</th>
<th>Other</th>
</tr>
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<tr>
<td>All respondents</td>
<td>311</td>
<td>74% (230)</td>
<td>26% (81)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>74% (164)</td>
<td>26% (57)</td>
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<td>Universities, including representative bodies</td>
<td>70</td>
<td>80% (56)</td>
<td>20% (14)</td>
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<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>12</td>
<td>25% (3)</td>
<td>75% (9)</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>100% (4)</td>
<td>-</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>75% (3)</td>
<td>25% (1)</td>
</tr>
</tbody>
</table>

Views of the majority of respondents stating ‘submission of the thesis’:

Respondents in favour of using the submission of the thesis believed this to be a clear, practical and measurable end point, for work having been fully completed. It was seen as a benchmark over which students could realistically exercise control and that there would be a “reasonable expectation” of students securing their qualification within six months of this date. Two universities also mentioned that this is the point from which local authorities no longer classify individuals as ‘students’ for council tax and welfare purposes.

A learned society was of the view that other benchmarks, such as conferment, would be too vulnerable to external factors; for example, it would be “inherently unfair” to penalise a student if an institution was unable to organise a viva and process the outcome in a timely fashion, or if an examiner is slow to process corrections.
There were mixed views on the subject of individuals undertaking work following completion of the thesis, with one university suggesting that students who take on jobs following submission may be perfectly able to cover themselves financially during the revisions process, and another of the view that pressure to take paid employment could affect the quality of the final stages.

If the submission of thesis benchmark is taken forward, one university made the point that the loan conditions should specify that, should there be major revisions, the individual would need to fund these themselves. Another suggested that if undisbursed amounts remain in a student’s total loan entitlement, the student could draw on these, if the need arises, whilst undertaking corrections.

“Using submission of the thesis as the benchmark for completion would be consistent with RCUK studentship policy.”

Research focused-organisation

“Although the viva usually marks the formal completion of a doctoral qualification, meetings can sometimes take months to hold, especially if there is an international external examiner. [The earlier] thesis submission date is a much fairer limit to use because it is a date that is fixed from the outset and can be easily calculated/tracked, even if a student interrupts or extends their study.”

University representative body

Views of the minority of respondents in favour of an alternative benchmark:

Respondents in favour of an alternative approach, particularly student representative bodies, generally argued that the thesis submission point did not represent the end of the process. They believed the course limit should extend to include the examination and correction period, potentially taking several months to a year, as this could require “major revisions” after the viva.

Other examples of costs mentioned by respondents that may need to be covered post submission included writing for publications immediately after an award (which may be considered ‘library costs’), attending conferences and interviews, as well as putting together proposals for post-doctoral research funding.

“The limit on course length should refer to confirmation of doctoral status. This would be more appropriate than submission of a thesis given that only 5% of thesis submissions are accepted ‘as-is’ (Golding et al. 2013) and revisions can add on three months.”

Student representative body
“When you submit your thesis prior to the viva, you lose your student status and any [financial] benefits attached to being a student. This is incredibly difficult, particularly as you still have to prepare for your viva, undertake corrections post viva and you still haven't actually completed your course, which means taking on full time work is tricky.”

Individual respondent

4.4 Factors Affecting Course Completion

Respondents were asked to select from a list the single main factor they believed would most affect the completion of doctoral programmes (Table 7). Individual respondents selected the widest range of options to this question, with financial difficulties the most commonly cited barrier (34% of respondents), followed by being unable to balance the demands of study with other commitments (21%). These were also the two most commonly mentioned factors by universities, with 26% stating financial difficulties and 20% referring to the difficulties balancing the demands of study with other commitments.

However, respondents were keen to emphasise that such factors cannot be viewed in isolation, accounting for the relatively high proportion of respondents ticking the ‘other’ box, particularly 83% of student representative bodies and three quarters (75%) of research-focused organisations.
Table 7 What is the main factor that affects completion of doctorates?

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Poor supervision</th>
<th>Loss of interest</th>
<th>Financial difficulties</th>
<th>Personal difficulties</th>
<th>Unable to balance demands of study with other commitments</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>311</td>
<td>9% (29)</td>
<td>4% (13)</td>
<td>30% (94)</td>
<td>9% (28)</td>
<td>21% (65)</td>
<td>26% (82)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>13% (29)</td>
<td>5% (12)</td>
<td>34% (75)</td>
<td>7% (16)</td>
<td>21% (47)</td>
<td>19% (42)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>1% (1)</td>
<td>26% (18)</td>
<td>17% (12)</td>
<td>20% (14)</td>
<td>36% (25)</td>
<td></td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>12</td>
<td>-</td>
<td>-</td>
<td>8% (1)</td>
<td>-</td>
<td>8% (1)</td>
<td>83% (10)</td>
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<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>25% (1)</td>
<td>75% (3)</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>50% (2)</td>
<td>50% (2)</td>
</tr>
</tbody>
</table>

Respondents across all groups were keen to point out that factors influencing doctoral completion are complex and interrelated, and not necessarily mutually exclusive. For example, financial difficulties can lead to students needing to take on part time work, resulting in them being unable to balance the demands of study with other commitments, in turn leading to personal difficulties. Conversely, a change in personal or family circumstances can potentially create the conditions for financial difficulties.
A university representative body referred to several sources of evidence to support its argument that finance can be a significant barrier; firstly a 2012 report which found that financial support issues can reduce the probability that students complete postgraduate study in a relatively short time\textsuperscript{11}, and secondly that the type of funding matters as much as the quantity of funding, for example fellowship-supported students are more likely to complete, and sooner, than students who are self-supporting\textsuperscript{12}.

One university referred to a 2013 London wide-survey of part-time doctoral students which found that 70\% of part-time students were funding their studies with their own resources and, of these, just under 50\% were concerned that they may have to withdraw from their studies for financial reasons\textsuperscript{13}.

“\textit{[Based on analysis of doctoral student leavers’ data over a ten year period], in 80\% of cases it is impossible to make a nuanced analysis of the particular issues leading to the withdrawal. The reasons behind these cases could range from changes in personal circumstances, to having problems of an academic nature such as finding the programme too hard or clashes of personality with their supervisor.]}”

\textit{University}

“\textit{Financial difficulties tie in inextricably with other commitments such as cost of childcare, ability to stay part time, or pressure to start a new job. If there is access to funding then the risk of not completing is lowered.}”

\textit{Individual respondent}


\textsuperscript{13} University College London Union & London Higher (2013) Extending discounts to part-time graduates
5. Course Eligibility

From the consultation document: The proposed loan would be available to all Level 8 doctoral degrees, including professional doctorates. Do you have any views on the course eligibility for the loan?

5.1 Views on Course Eligibility

Nearly all respondents agreed with the proposal for all Level 8 doctoral degrees to be eligible for the proposed loan, with 16 individuals favouring more tightly defined course eligibility criteria. Most organisations and individuals argued that not restricting course eligibility would help to create a level playing field between subjects and disciplines that are viewed as equally important in the context of high quality research and knowledge advancement. From an operational perspective, they felt this would make the loan much easier for institutions to manage and maintain, as well as being much simpler for students to understand.

One learned society felt that if a cap needed to be placed on the number of loans that could be made available, prioritisation should be given to those pursuing study in Science, Technology, Engineering and Maths (STEM) subjects on the basis of their importance to the economy and “the increasing skills gap employers report for STEM trained students”. Whilst organisations did not argue strongly in favour of funding STEM subjects over other disciplines, a small minority of individual respondents echoed this learned society’s view.

Five organisations (four universities and one representative body) specifically mentioned the ‘PhD by Published Work’ route\(^{14}\). Three made the point that this type of qualification should be within scope, while two believed that it should be excluded (although further supporting information was not provided).

Four other respondents, discussing professional doctorates, commented that the loan could bridge a gap where employers would be otherwise unable or unwilling to provide financial support. However, a small minority of universities commented that the eligibility criteria should take account of, and potentially exclude, doctoral programmes which attract funding from other sources and sponsors, with examples given of the Doctor of

\(^{14}\) The ‘PhD by published work’ route is intended primarily for mid-career research-active academics who, for one reason or another, haven't had the opportunity to undertake a research programme leading to a doctoral qualification.
Business Administration for which funding is likely to be obtained from industry, as well as the Doctorate in Clinical Psychology where this is funded by the NHS.

Among the 16 individual respondents who favoured tighter eligibility criteria, the main points were that the loan should prioritise STEM subjects, be restricted to professional doctorates, be targeted to programmes delivering the skills that employers say they need, only be available to those with low income/no savings, and require that students have obtained a minimum undergraduate degree level (e.g. 2:1).

“The balance of existing postgraduate research funding across disciplines is evident through the investments across the RCUK Doctoral Training Partnership (DTP) model. Any prioritisation which deviated from this broad balance would need clear justification and to be based on evidence of need.”

University

“I think you should allocate the loans to the subjects which have very little funding (i.e. Humanities). It’s also cheaper to fund a humanities PhD per year, so you would be able to fund more people for the same money.”

Individual respondent

5.2 Interaction of Master’s and Doctoral Loan Products

From the consultation document: The intention is that eligibility for the doctoral loan would depend on the exit qualification expected from any course of study. Doctoral loans would be available where the expected exit qualification is a doctorate, and we would expect students to state their intended exit qualification at the outset of their course. If a student’s intention from the outset is to exit with a doctorate, they would be eligible for a doctoral loan to cover the course, even if it includes a period of master’s level study, e.g. an MRes. A student in this scenario would not be eligible for a postgraduate master’s loan.

Are there any practical implications of the interaction of the two loan products that we should consider with regard to course eligibility?

On average, just over half of respondents (52%) answered ‘yes’. This included the majority of student bodies (82%) and universities (71%) although three quarters of research-focused organisations (75%) and 44% of individuals answered ‘no’ (Table 8).
Table 8 Are there any practical implications from the interaction of the two loan products that should be considered?

<table>
<thead>
<tr>
<th>Category</th>
<th>Base</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>310</td>
<td>52% (161)</td>
<td>48% (149)</td>
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<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>44% (98)</td>
<td>56% (123)</td>
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<td>Universities, including representative bodies</td>
<td>70</td>
<td>71% (50)</td>
<td>29% (20)</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>11</td>
<td>82% (9)</td>
<td>18% (2)</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>25% (1)</td>
<td>75% (3)</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>75% (3)</td>
<td>25% (1)</td>
</tr>
</tbody>
</table>

While three of the four research-focused organisations chose to make no comment, one learned society was of the view that a doctoral loan should not preclude a master’s loan and that the system should ensure sufficient flexibility to avoid any disadvantages to students seeking support.

Universities responding to the consultation outlined a range of potential complexities. A key point was that institutions manage progression between master’s and doctoral courses differently and this can include a variety of different arrangements within one institution depending on the subject area. In some cases, students enrol on a master’s course and transfer upon successful completion to a doctorate, whereas in other cases, they enrol as a doctoral student and, if progression is satisfactory, their registration continues.

One university explained that where an MPhil student transfers to PhD, the same research work is used for both degrees, whereas in the case of an MRes followed by PhD, the student would achieve the MRes and then do new work for the PhD.

For ‘integrated’ applicants (i.e. those embarking on a master’s course with the intention to progress and exit with a doctorate), a university body and five institutions raised the question that this could put integrated students at a financial disadvantage, given that they would only be eligible for a maximum of £25,000, whereas a standalone master’s and doctoral applicant could benefit from both loan products up to a maximum of £35,000. There was a concern that the Government’s proposal could lead to a “perverse incentive” for students to de-couple their learning in order to maximise their financial entitlement.
There was a call from several respondents for clear guidance around students’ eligibility for one or both loan products; depending on their intended exit qualification when they embark on a Level 7 master’s qualification.

Some respondents also raised other considerations (each mentioned by one respondent):

- It is unclear what would happen if a student embarks on a master’s course with the expectation of going on to complete a doctorate, but is then unable to proceed to Level 8 for legitimate reasons, or their intentions change;

- It may be difficult for institutions to identify students’ real intentions upon application, for example they may apply for a doctoral course in order to benefit from the loan “regardless of their real qualification intention”;

- In a relatively small number of cases, students might start on a master’s course and then, on evidence of exceptional performance, be upgraded to a Level 8 qualification;

- Implications would need to be considered if a student: a) changes institution; b) changes their mode of study (e.g. from full time to part time), or c) wishes to undertake a second funded doctorate where the first was funded by a doctoral loan.

“We would prefer for the loan products to be separate. System wise, we would be none-the-wiser if a Master’s student was on a 1+3 programme and therefore whether their doctoral application had been intentional or in error. This is probably the most complex area of the implementation.”

University
6. Funding and Repayments

6.1 Sources of Funding for Doctoral Study

From the consultation document: The proposed loan amount is intended to be a contribution to the costs of pursuing doctoral study and is not intended to provide finance to cover all the associated costs of study.

Respondents were asked what current sources of funding are provided by other bodies that might enable students to meet the costs of pursuing doctoral study (i.e. on top of the doctoral loan)\textsuperscript{15}.

Of the 222 responding individuals, 48 stated ‘nothing’ or that they did not know what alternative sources of funding they might be able to use. Twelve individuals referred to self-funding (e.g. use of savings) or support from family. Those mentioning bursaries or scholarships tended to view these as extremely competitive, while grants from charitable organisations were considered to be widely stretched and potentially quite small in value. Part time employment was viewed as potentially detrimental to the time and investment needed to complete a doctorate.

Universities mentioned institutional awards for continuing study, fee discounts to Alumni or siblings, fee waivers for staff and alumni-funded places. The development by RCUK of Centres for Doctoral Training (CDT) and Doctoral Training Partnerships (DTP) was described by one university as having provided focused high quality training, but that it requires significant matched funding arrangements among partners.

Many respondents stressed the importance of existing public funding to support study and that doctoral loans should avoid dis-incentivising the offer and take-up of financial support from existing funders.

“There are a huge number of funding/grant awarding bodies that provide support for PhDs with the majority of them only providing small amounts which could be used to top-up the doctoral loan.”

\textit{University Representative Body}

\textsuperscript{15} This question was framed hypothetically, meaning that individuals answered with reference to what they were aware of, rather than (in the case of prospective students) what they would be most likely to use themselves.
“Most universities have schemes that provide bursaries for partial funding of doctoral study. In addition, in many subjects, it is possible to obtain further partial funding (either in the form of wages or a bursary) for undertaking teaching/demonstrating duties.”

University

“The availability of third party sponsorship varies by discipline, and is very challenging in the arts and humanities. The cost of study varies between disciplines, and is often greater in STEM subjects.”

University

6.2 Meeting Additional Costs

Respondents were asked how institutions and others might provide new and innovative packages of support to help meet the costs of study that are not covered by the proposed loan.

Suggestions and comments in response to this question were many and varied. As most institutions already provide some form of financial support, universities generally indicated that this would continue to be the norm and that institutions should not be expected to simply ‘top-up’ any loan secured by a student.

A minority of institutions acknowledged that the introduction of a loan would help them to leverage more support for doctoral research from industry and charities (particularly for disciplines where this is currently a challenge). They indicated that this could be facilitated through partnerships which already exist and which could be expanded through further investment, closer relationships and improved coordination. Several others mentioned that other bodies may be encouraged to provide financial support if they were to see a business benefit from the new loan, or if they were looking to form strategic alliances with an institution.

One suggested option was for universities to offer more part-time doctorates for a lower fee, especially in regions where there is a substantially higher cost of living than elsewhere in the country. The question of geography was also raised by another respondent, who suggested the possibility of considering whether some (e.g. devolved) funding allocated to Level 8 skills could be reallocated to doctoral study in areas of demonstrable local sector demand. Some respondents also raised other considerations (each mentioned by one respondent):

- Rather than assume that universities will provide additional support packages, a smaller, capped number of loans could be offered by Government but for a larger
amount (the overall investment being the same but the value for money being arguably higher);

- Some types of existing funds (e.g. hardship funds) could be re-packaged to work alongside doctoral loans, with a proportion of that funding ring-fenced for under-represented groups;

- Fees-only bursaries could be coupled with loan support to provide a more integrated and attractive package for students;

- Additional financial support could be offered through Graduate Teaching Assistantships, Graduate Research Assistants and Alumni awards;

- Partial or whole fee waivers could be considered in subject areas in which universities wish to grow doctoral numbers;

- Institutionally-sponsored bursaries could be offered to recent graduates to reward excellence;

- Extend the ICASE\textsuperscript{16} scheme to allow SMEs and public sector/charitable bodies to enter at lower cost, providing a platform for wider external/industry engagement;

- Funding could be made available for students to undertake three or six month internships at strategic points during the doctorate to assist a partner organisation with a specific issue and to enhance the student’s external engagement;

- Students could be offered more paid junior tutoring positions;

- Joint Research Council funding could promote cross-disciplinary studies to tackle grand challenges, for example joint NERC/EPSRC funding to tackle the environmental challenges associated with large scale engineering projects such as offshore renewable energy; and

- Consider R&D Tax Credits or subsidised childcare for doctoral students.

\textsuperscript{16} Industrial Cooperative Awards in Science & Technology (ICASE) from Research Councils provide funding for doctoral studentships where businesses take the lead in arranging projects with an academic partner of their choice.
There were mixed views about how the balance of different types of funding would play out in the future. A positive outcome could be that universities receive lower value bursary requests, enabling them to offer bursaries to more students. However, this would need to be balanced alongside the desire by institutions to reward excellence, and not dilute the quality of doctoral research by widening the pool of potential bursary recipients. There was also a perceived risk among a small minority of organisations that some institutions would simply reduce their overall bursary offer following the introduction of a new loan.

One student representative body made the point that the current funding system is already over-complicated, and emphasised the importance of clear advice and guidance for students to help them navigate their way through different funding options.

### 6.3 Duplicate Funding

**From the consultation document:** The proposed loan would only be available to students who do not receive a Research Council studentship (this includes fees-only awards). This is to avoid two different streams of public money being used to fund the same purpose. Additionally, an objective of the loan is to support take-up of doctoral study by those not currently in receipt of public finance (not to supplement or replace existing Research Council funding).

Apart from Research Council studentships and fees only awards, how should other sources of public funding be treated when considering whether to offer a loan (e.g. funding for professional doctorates from other sources)?

While this question was answered by almost all organisations, several respondents were unclear as to how, precisely, the Government set out to define ‘public money’ in this context; for example whether this included funding from public sector employers (such as the NHS), university scholarships, charities etc.

As the proposed maximum £25,000 loan is only intended to cover part of the required costs associated with doctoral study, most respondents considered it crucial that the loan can be combined with funds from multiple sources to avoid creating a barrier to study. A university representative body, whilst agreeing with the proposal that loans should not be available to students in receipt of Research Council studentships, believed that these students should have an option to access a loan should they need further time and support to complete their doctorate. A key message from this respondent was that any other public support accessed for doctoral study should not prevent students from accessing loans, so long as the loan is in sequence to, and not in parallel with, that other public funding.
Half of the 60 responding universities voiced concerns around the proposed exclusion of students in receipt of Research Council studentships, particularly fees-only students. They argued that this exclusion risked putting these students at a financial disadvantage. Several respondents noted that students obtaining other grants or bursaries, potentially of the same value, would not be affected in the same way and questioned why that should be the case.

A university representative body, echoed by several institutions, suggested that a mechanism could be put in place for adjusting the amount of the doctoral loan award depending on the amount of other public funding accessed by the student, i.e. as opposed to simply excluding students with RCUK studentships.

Other points were raised around the potential administrative complexity:

- Clarity is needed as to where the administrative burden will fall in assessing and confirming eligibility in relation to any existing public funding applied for or obtained by students, for example whether this would be the responsibility of the Student Loans Company, the institution or whether it would rely on self-declaration by students;

- Linked to the above point, clarity is sought as to what would happen if a student is initially supported by a doctoral loan but applies for Research Council studentship at the same time or at a later date;

- A university representative body questioned how loans would be aligned with welfare benefits/tax credits.

One university suggested requiring a declaration from prospective students highlighting any public funding of which they are in receipt, accompanied by a sound financial case for the additional level of loan funding being sought.

A total of 165 individual respondents answered the question. The main views were that the new loan should only support those most financially disadvantaged, that it should not be offered to those in receipt of other public funding, or that the loan amount could potentially be ‘adjusted’ where a student already has Research Council or other funding.

“The proposal to only make loans available to students who are not in receipt of Research Council studentships or fees-only awards would appear to potentially disadvantage Research Council funded students compared to others in receipt of funding from other sources.”

Research-focused Organisation
“We strongly believe that, regardless of the eligibility of RCUK funded students, students funded from other public sources should be treated the same as self-funded students when seeking a loan.”

University

“I would suggest offering a maximum public-funding cap per student, irrespective of source, to ensure equal access. For instance, if a student were to receive £12.5k per year for a professional doctorate from a public body, they could apply for £12.5k loan.”

Individual Respondent

6.4 Meeting Repayments

**From the consultation document:** The proposed repayment terms are as follows:

- Based on a £25,000 maximum loan, the interest would be calculated at RPI+3% commencing when payment is issued to the student;
- Repayment would be income contingent and in line with the repayment threshold of the master’s loans, currently set at £21,000 until April 2021;
- The intention is for doctoral loan repayments to be calculated at 6% of income above the income threshold. This is pending a final policy decision, which will be informed by this consultation, and made on the grounds of affordability, feasibility and value for money. Repayments would be made concurrently alongside repayment of any outstanding undergraduate loan;
- For those students with a master’s loan, the intention is for repayment to be taken through one single postgraduate loan repayment of 6% of income above the repayment threshold, covering both master’s and doctoral loan balances; and
- Any outstanding doctoral loan balance would be written off 30 years after the point a borrower becomes liable to begin repaying a loan.

Are there any potential impacts of students taking out a doctoral loan on top of a master’s loan, which we may not have considered?

Most respondents (57%) answered ‘no’ to this question, although the majority of universities (53%) answered ‘yes’ (Table 9).
Table 9 Is there any other potential impact of students taking out a doctoral loan on top of a master’s loan?

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>310</td>
<td>43%</td>
<td>57%</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>41%</td>
<td>59%</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>53%</td>
<td>47%</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>11</td>
<td>36%</td>
<td>64%</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>-</td>
<td>100%</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>50%</td>
<td>50%</td>
</tr>
</tbody>
</table>

Respondents who did not consider there to be any additional potential impact generally described the repayment terms as simple, fair and appropriate, particularly combining master’s and doctoral loans into a single payment and calculating repayments at 6% of income. Furthermore, one university mentioned that the proposed terms of the government-backed doctoral loan looked preferable to those offered by a Career Development Loan (CDL).

Several organisations and individuals expressed similar concerns about the compounding effect of a student taking out multiple loans (undergraduate, postgraduate and doctoral) and rising levels of indebtedness. It was argued that this could have a detrimental impact on students’ ability to repay the amount borrowed, obtain a mortgage or meet other future commitments. Several organisations noted that the longer term impact on graduates is unlikely to become clear for a number of years.

It was also argued that increasing levels of borrowing, or the fear of debt, may inadvertently incentivise potential students to take paid employment over embarking on doctoral study.

“Prospective students will need to be clear on the conditions of repayment, and in particular, the income contingent nature of the loans.”

University

“I'm in the middle of an MA and I'm up to nearly £40K. The rate that interest continues to accrue means that I have no real expectation of being able to pay this off.”

Individual respondent
7. Impact on Employers and Business

Certain questions in the consultation were aimed primarily at employers, however there were no respondents who answered on behalf of their organisation in the category of ‘employer’. On that basis the findings in this section should be treated with a degree of caution since they represent the views and perspectives of other groups, including individual respondents.

7.1 Benefits to Industry

From the consultation document: We would welcome views from employers and business on the best way of designing the scheme to minimise the burden on employers and business. In which of the areas below does the proposed new loan offer advantages to employers?

- Increased supply of high level skills
- Increased employability
- Increased innovation
- Increased supply of specialist knowledge
- No benefits to employers

A range of answers was given, with each respondent selecting an average of two options. It should be noted that 107 respondents (62 individuals and 45 organisations) were unable to answer this question.

The findings indicate that the loan would offer advantages in terms of increased supply of specialist knowledge (29% share), increased supply of high level skills (27%), increased innovation (23%) followed by increased employability (18%). Only 18 respondents (including 17 individuals) were of the view that the loan would offer no benefit to employers (Table 10).
Table 10 In which of the following ways does the proposed loan offer advantages to employers?

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Increased supply of high level skills</th>
<th>Increased employability</th>
<th>Increased innovation</th>
<th>Increased supply of specialist knowledge</th>
<th>No benefit to employers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>All responses</strong></td>
<td>All responses</td>
<td>619</td>
<td>27% (165)</td>
<td>18% (111)</td>
<td>23% (143)</td>
<td>29% (182)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>471</td>
<td>26% (124)</td>
<td>17% (82)</td>
<td>23% (106)</td>
<td>30% (142)</td>
<td>4% (17)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>119</td>
<td>28% (33)</td>
<td>20% (24)</td>
<td>24% (29)</td>
<td>27% (32)</td>
<td>1% (1)</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>15</td>
<td>27% (4)</td>
<td>20% (3)</td>
<td>27% (4)</td>
<td>27% (4)</td>
<td>-</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>7</td>
<td>29% (2)</td>
<td>14% (1)</td>
<td>29% (2)</td>
<td>29% (2)</td>
<td>-</td>
</tr>
<tr>
<td>Others</td>
<td>7</td>
<td>29% (2)</td>
<td>14% (1)</td>
<td>29% (2)</td>
<td>29% (2)</td>
<td>-</td>
</tr>
</tbody>
</table>

Respondents were also asked what difficulties employers might face if the loan was administered through payroll.

Many felt unable to comment in response to this question. Of those who did, around half of organisations and individuals did not believe employers would face any difficulties if repayments were to be handled the same way as for undergraduate loans. One individual pointed out that employers who operate digital payroll systems should find the new arrangements relatively straightforward to implement.

17 This was a ‘multiple-response’ question in the consultation, therefore the base numbers and percentages denote the number and share of total responses, respectively. This approach enables the most to least commonly mentioned answers to be easily identified.
Predicted challenges raised by respondents mainly related to the risk of confusion and/or the increased administrative burden for employers, particularly for payroll departments.

Very few respondents offered a view on how the Government could mitigate those challenges. Of those who did, the main suggestion was to develop a strong awareness and information campaign aimed at employers, possibly supported by online guidance and a telephone helpline, and ensuring sufficient lead-in prior to doctoral loans being introduced. The next most common suggestion was for repayments to be collected ‘at source’ through the tax code system.

“Employers would find ways to adapt to this scheme as they have done with other student loans.”

*Individual respondent (who mentioned in this context that they are also an employer)*

### 7.2 Support from Employers

**From the consultation document:** The loan amount is intended to cover around a third to a half of the total costs of a doctorate, and is intended to be a contribution towards the costs of pursuing doctoral study, rather than to specifically cover tuition fees or living costs.

Based on the contribution to costs principle, are there features of the proposed loan scheme that you feel could be changed or enhanced that would encourage you as an employer or business to contribute to your employees undertaking a doctoral training programme?

Most respondents answered ‘no’ to this question, although the base number answering this question was considerably lower than that of other questions, inevitably due to it being directly aimed at employers (Table 11).
Table 11 Could features of the proposed loan be improved to better encourage employers to contribute?

<table>
<thead>
<tr>
<th>Base</th>
<th>Yes (%)</th>
<th>No (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>27% (45)</td>
<td>73% (120)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>28% (37)</td>
<td>72% (96)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>27% (7)</td>
<td>73% (19)</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>-</td>
<td>100% (2)</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>-</td>
<td>100% (2)</td>
</tr>
<tr>
<td>Others</td>
<td>50% (1)</td>
<td>50% (1)</td>
</tr>
</tbody>
</table>

Suggestions for improvement put forward by individual respondents mainly related to improving employers’ awareness of the benefits of employing doctoral graduates, to both their business and the wider industry sector. They also suggested offering tax incentives and encouraging more employers to offer paid placements to doctoral students.

The following suggestions were raised by four separate organisations:

- Employers should be encouraged to provide matched funding;
- Employers should be incentivised to repay the loan on behalf of students to reward increased productivity for the future;
- A study assistance scheme could help employees who wish to undertake a doctoral qualification (already offered by one responding university for its staff); and
- A strong information campaign targeted to employers would be beneficial to raise awareness.
8. Wider Considerations

8.1 Public Sector Equality Duty

**From the consultation document:** The proposed loan does not make any distinction regarding the Public Sector Equality Duty protected characteristics, with the exception of age in determining eligibility. The protected characteristics include: age, gender, gender reassignment, disability, race, marriage and civil partnerships, pregnancy and maternity, sexual orientation, religion and belief.

Are there other issues Government should be aware of, which would impact on the take-up of this proposed loan by those with any of the protected characteristics, and what steps might Government take to mitigate any negative impact?

Less than half of individual respondents (40%), half of universities, and the majority of other organisations, answered ‘yes’ to this question and took the opportunity to raise specific issues (Table 12).

**Table 12 Are there any other issues that would impact on those with protected characteristics?**

<table>
<thead>
<tr>
<th></th>
<th>Base</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>All respondents</td>
<td>311</td>
<td>45% (139)</td>
<td>55% (172)</td>
</tr>
<tr>
<td>Individuals, including current and prospective students</td>
<td>221</td>
<td>40% (88)</td>
<td>60% (133)</td>
</tr>
<tr>
<td>Universities, including representative bodies</td>
<td>70</td>
<td>49% (34)</td>
<td>51% (36)</td>
</tr>
<tr>
<td>Student representative bodies (including Students’ Unions)</td>
<td>12</td>
<td>75% (9)</td>
<td>25% (3)</td>
</tr>
<tr>
<td>Research-focused organisations, including learned societies and professional bodies</td>
<td>4</td>
<td>100% (4)</td>
<td>-</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
<td>100% (4)</td>
<td>-</td>
</tr>
</tbody>
</table>

Summarised below are views raised in relation to several protected characteristics, each of which was mentioned by a small minority of respondents in the context of the proposed loan.

Twelve respondents, including five organisations and seven individuals, described the loan as ‘discriminatory’ in the context of one or more of the protected characteristics.
- **Age**: The proposal to introduce an age restriction was criticised by 21 respondents (six organisations and 15 individuals), although this needs to be balanced alongside the importance of maximising value for money through repayments;

- **Gender**: Seven respondents (three organisations and four individuals) argued that the proposed length of the loan (six years) could disproportionately affect some females, particularly if a break were to be needed for pregnancy or maternity reasons. There were also calls for sufficient flexibility to be built into the loan to permit smooth transitioning between full and part time study;

- **Disability**: Nineteen respondents (nine organisations and 10 individuals) felt that the proposed length of the loan could negatively affect disabled students who are studying on a lower intensity part time basis, as well as those with caring responsibilities;

- **Race**: Two student bodies referred to research carried out by the National Union of Students in 2015 to support the argument that black and minority ethnic (BME) students, and those from lower socio-economic backgrounds, can perceive debt differently to other groups which may prevent them from taking out the loan and pursuing doctoral study. A key concern is that this could “polarise” research if individuals with particular characteristics are more debt averse;

- **Religion and belief**: One university and an individual mentioned that the interest rate of 3% above RPI, if associated with profit, could be restrictive for some Muslims and members of other faiths under Sharia law.

A university also cited Wakeling & Kyriacou (2010) stating that: “There is evidence that most postgraduate researchers are drawn from particular groups, with under-representation among women, particularly in the sciences, and that ethnicity has a bearing on access to postgraduate research degrees, both in the immediate progression after a first degree and in later transitions”.

### 8.2 Other Equality Considerations

A minority of institutions and individuals commented positively that the new loan, coupled with more part-time study opportunities, could help to encourage and incentivise applicants with family commitments, as well as individuals from disadvantaged backgrounds.

Conversely, several organisations and individuals expressed concern that the loan could negatively impact those from lower socio-economic groups, whereby the amount of debt accumulated during university life could make doctoral study prohibitive and lead to higher numbers of drop-outs. Two universities also asked for clarity as to how the loan
would impact on benefit entitlements (cf. section 6.3 where there is also mention of welfare benefits).

Four universities stated that gains made in widening participation at undergraduate level must not be reversed by widening inequalities at the postgraduate level. They argued that future evaluations of impact should be carried out to examine the characteristics of individuals taking out loans, including their backgrounds and circumstances as well as identifying any 'cold spots' for postgraduate participation.

“Work and family commitments can lead to the abandonment of PhDs; the new loan scheme will be a great help in dealing with and solving these issues.”

University

“Without sponsorship from my employer I would not have the financial means to continue study. The rigours of PhD study are very intense and those studying part-time are normally doing so due to work, family or other commitments. This juggle is a frequent reason for students dropping out.”

Individual respondent

8.3 Additional Considerations

This section sets out additional considerations raised by respondents that were not directly asked about in the consultation document.

A research-focused organisation responding to the consultation was of the view that a £25,000 loan for postgraduate research, whilst insufficient on its own, may have a role in topping up other funding for doctoral research. However, the same respondent expressed some concern that simply increasing the numbers of doctoral graduates would not be enough to increase the number of individuals with higher level skills in the areas of greatest need. They also commented that the consultation “appeared to have underestimated” the average total cost of a full-time doctoral programme, with the minimum cost being more like £60,000 including stipend, fees and research costs, and potentially even higher in wet lab research18.

18 Wet laboratories are typically those where chemicals, drugs, or other material or biological matter are handled in liquid solutions or volatile phases, requiring direct ventilation, and specialised piped utilities (typically water and various gases).
A further consideration raised by a research-focused organisation, and corroborated by two universities, was that higher volumes of doctoral student numbers could lead to unsustainably higher costs for institutions, particularly in expensive subjects such as wet lab research. One university stated that “analysis of TRAC\(^{19}\) data showed that universities spend considerably more educating each home doctoral student than they receive in fee income” (University).

Two universities expressed some fundamental concerns about the idea of a loan as a means of strengthening support for doctoral students. One emphasised that it would be imperative to keep scholarships at the forefront of doctoral study. Another mentioned that they had experimented with scholarships of “varying levels” over the past decade and found that, where they only offered partial scholarships, this rarely attracted the best candidates. This apparently led to requests for hardship funding or students taking on jobs that prevented them fully focusing on their research, and was ultimately “to the detriment” of completion rates.

Eight individuals felt strongly that the loan should not be implemented at all, arguing that widening access to doctoral study risked “diluting quality”, and that there would not be sufficient doctoral level jobs for the anticipated increase in doctoral graduates (one respondent said that “[they] have far too many PhD students already to too few academic posts”).

Other considerations generally raised once by an organisation or individual.

- Announcing the doctoral loan scheme’s implementation from the 2018/19 academic year could adversely impact 2017 recruitment levels, with prospective candidates deciding to wait a year prior to making an application;

- Clear measures should be put in place for accurately determining student residency, drawing on any lessons learned from the implementation of the taught master’s loans;

- There is a need to consider how to recoup funds from doctoral graduates who move abroad, and associated administrative arrangements;

- Identifying the correct level of repayment may be complex for doctoral graduates who become career academics and frequently hold either short-term roles or part-time roles at several institutions;

\(^{19}\) Transparent Approach to Costing (TRAC) is the methodology developed with the higher education sector to help them cost their activities. (Source: HEFCE)
• Once introduced, changes to the scheme should be kept to a minimum to avoid confusion;

• The Government should consider exploring other efforts to raise funds for postgraduate scholarships through philanthropy and business contributions (e.g. match-funding for philanthropic donations); and

• The setup of new types of loans offers an opportunity for students to ask to provide their consent for information about their loan application to be shared with credit reference agencies to assist with future credit decision making, i.e. as and when students make additional credit facilities.
9. Conclusions

Consultation respondents generally welcomed the postgraduate doctoral loan proposals. Detailed feedback from respondents provides an opportunity for the Government to consider key technical details, the implications for implementation, and offer greater clarity may be needed.

1. The age restriction of '59 and under’ appears to be fair and strikes an appropriate balance between enabling the broadest possible access to doctoral study and mitigating the risk of non-repayment.

   The proposed age cap is generally considered by respondents to be sensible and they support aligning this with the master’s loan. While some concerns were raised that older doctoral graduates may be less likely to complete repayment, they could have higher earnings potential and go on to work beyond state retirement age.

2. The doctoral loan is unlikely to incentivise large numbers of students to study purely for personal benefit.

   Respondents argued that doctoral study is not entered into lightly, especially given the significant financial costs involved and the fact the proposed loan would inevitably need to be supplemented by at least one other source of funding. However, for those who do choose to study for personal benefit, a small number suggested that value for money should be considered not only in the context of loan repayments, but in terms of the contribution to advancing the UK knowledge base, benefits of doctoral research to institutions and society, as well as future earnings potential.

3. There is little support for capping the number of doctoral loan places per institution.

   There are concerns that the proposed approach risks stifling smaller and more specialised research institutions; furthermore that this could limit student choice, especially among part time students who may be less able to travel. Respondents also cited a number of practical and administrative complexities associated with capping doctoral loan places for institutions.

4. The proposed maximum course length of six years would benefit students who need to study part time. Additional flexibility may be needed for some students and, according to more than 30 universities, the Government should consider extending the loan length to seven or eight years.

   Six years is expected to be sufficient for most students but this is unlikely to suit all courses and could be overly restrictive. There are numerous calls from respondents for the course length to be extended to seven or eight years.
5. To ensure timely completion of doctoral programmes, universities are generally favourable to the idea of reporting students’ progress as a trigger for loan payments, however, the frequency of progress reporting frequencies currently vary between institutions.

To help ensure courses are completed on time, respondents mentioned opportunities for the loan payment system to be linked to institutional monitoring of student attendance and progress, with this information then being shared with the loan funder.

Additionally, the submission of the thesis is viewed as the clearest measurable end point for completion of the doctorate.

6. There is strong support among respondents for the loan to be available for all doctoral degrees.

The vast majority of consultation respondents welcome the loan be open to all subjects and disciplines. Whilst a small minority of respondents were keen to advocate the strategic importance of certain subjects to the economy, such as STEM, others emphasised that arts and humanities subjects, which attract comparatively less current public funding, are vitally important for creativity and innovation.

7. The proposed approach of basing loan eligibility on a student’s qualification intentions appears to be sensible, but would need clear guidance and FAQs for applicants.

Respondents have asked for clarity around what would happen where students are unable to progress from a master’s cause to their ‘intended’ doctoral qualification, or if their intentions change.

8. The loan ought to complement other forms of public and private funding for doctoral programmes, in the interests of ensuring choice for students.

There is a general recognition among respondents that the loan ought to complement other sources of funding for doctoral programmes to avoid creating a barrier to study. However, questions were raised around the rationale for excluding Research Council studentships whilst including other forms of ‘public funding’.

9. The value added by the new doctoral loan should outweigh any negative implications associated with rising levels of student debt and pressures on institutional resources.

Respondents commented that it could be many years before the implications of increasing levels of undergraduate and postgraduate loans are realised, for example the impact for students in obtaining a mortgage and paying for childcare etc. There is
also a risk that rising numbers of doctoral students could put pressure on an institution’s existing resources and equipment, which they argue is not sufficiently covered by tuition fees alone.
Appendix 1. About Doctoral Qualifications

A doctoral degree, which stands at the pinnacle of academic achievement, is classified in England as a Level 8 qualification in the Quality Assurance Agency’s Higher Education Framework for Higher Education Qualifications\(^{20}\). These include Doctor of Philosophy qualifications, usually abbreviated as PhD or DPhil, as well as professional doctorates that are rooted in the professional practice of the candidate, such as Doctor of Education (EdD) and Doctor of Business Administration (DBA). The main focus of a doctoral candidate’s work is their contribution to existing knowledge in their subject discipline through original research or the original application of existing knowledge or understanding.

Funding bodies support doctoral students in different ways, for example some will only pay course fees, others will include a stipend (maintenance costs) or travel expenses while some will offer one-off award to ease the financial burden. A key funding source includes the seven Research Councils, which offer standardised criteria and amounts under the umbrella of Research Councils (RCUK). These Research Council studentships include fees and a tax free minimum stipend of £14,296 per annum (2016/17 rates), which are available through the participating universities rather than the Research Councils themselves. Other funding sources include those offered by academic institutions, charitable organisations, employers, banks, as well as self-funding arrangements by students themselves.

Public funding for research in English higher education is administered under a 'dual support' system. Under this system, the Higher Education Funding Council for England (HEFCE) provides annual funding for English institutions in the form of a ‘block grant’, and the UK Research Councils provide funding for specific research projects and programmes. HEFCE funding supports higher education institutions' (HEIs) research infrastructure and enables ground-breaking research in keeping with their mission\(^{21}\).

\(^{20}\) Quality Assurance Agency (2014) *Doctoral Degree Characteristics*  
\(^{21}\) Source: HEFCE