Q.5 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?

Yes – for the reasons outlined by the Government in the consultation document

Q6. 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.

No.

We are pleased that the government is consulting on a loan system for postgraduate doctoral study. Funding at this level is really important and members confirm that many self-funded students do run into financial difficulty, which restricts timely completion of their study.

Since the value of the loan will cover, at most, around half of the costs of completing a doctorate, we do not consider the proposed loans will disproportionately incentivise study for personal benefit at doctoral level. An individual will require significant additional financial support, over and above the loan, to fund their studies.

In addition, the admissions process to doctoral study is very rigorous, based on the quality of the research proposal, an assessment of an individual's ability to undertake the research, and the alignment of the project against supervisory expertise and necessary resources.

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Q7. Other than an age eligibility restriction, can you propose any other ways of mitigating the associated value for money issues? Please explain your answer and give evidence where possible:

Loans could be contingent on an individual's income from employment or success in securing other sources of studentship funding (e.g. university-funded scholarships) so that students could only gain access to a doctoral loan if they can demonstrate they have plans for how they can make up the amount needed to complete their doctorate (since the loan will only cover a portion of the costs).

There could also be an inducement to encourage in-kind collaborative arrangements with a third party. This would explicitly link the student's research and skills to the economy and/ or society. Although these sorts of arrangements can be relatively complex and time-consuming to administer and so we wouldn't recommend they should be a pre-requisite for obtaining loans.

We also suggest instituting a robust mechanism for retrieving loan repayments for those PhD graduates who leave the UK for a career overseas (a reasonably common career pathway for those with doctorates).

Q8. We are intending to make the loan available for doctoral courses that last up to 6 years, and the older the doctoral student, the fewer the number of years they would have to repay the loan. In your view, which of the age eligibility restrictions below would best achieve the government's aims - broadening and strengthening the research base and addressing employer demand for high level skills - whilst also providing good value for money for the taxpayer?

An age eligibility restriction of 59 and under

On balance we think that the 59 age limit is a reasonable compromise between widening access and minimising risk to the tax payer. We would be concerned if the age limit was lower than 59 on equity grounds.

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Our members' experience suggests it is unlikely that large numbers would apply who would never make repayments. Older cohorts are predominantly registered for part-time study - either part-time PhD or professional doctorates – with part-time students frequently working alongside their studies. Professional doctorates are generally undertaken by senior professionals and managers, who will apply higher level skills directly to their professional practice, even in the course of their studies. Students on professional doctorates are likely to be undertaking applied research and addressing 'employer demand for high level skills' concurrently with their studies. They are also likely to be already earning in the income band for repayment purposes. Restricting loans to younger cohorts would impact on access to professional doctorates, and there may be a case for setting a different (higher) age eligibility restriction for professional doctorates.

There is no age limit applied to RCUK studentships, where there is a similar need to ensure value for money for the taxpayer. However, despite there being no age restriction, it appears that RCUK studentship funding is awarded disproportionately to the younger age brackets. This is particularly the case for the arts, humanities and social sciences, where RCUK estimates for the 2013/14 student population aged 40 and under are around 30% (32% ESRC, 28% AHRC), while the funded population aged 40 and over, where declared, is 8% (AHRC) and 6% (ESRC). Data available at http://www.rcuk.ac.uk/documents/documents/researchcouncilsdiversitydataapril2016-pdf/

If it is true (as suggested by the data above) that older cohorts are already disadvantaged in accessing RCUK funding, setting a lower age eligibility restriction for doctoral loans would further limit access of mid-career and senior professionals to upskill via doctoral study.

An age restriction at 59 also has the benefit of providing clarity of information for prospective students as the eligibility is in line with the eligibility for PGT loans.

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Q9. 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? Please explain your answer and give evidence where possible:

We do not support the suggested cap on numbers of doctoral loan places. Number caps limit widening participation and prevent the efficient working of the market – whereby students and employers choose institutions that support their research and career aspirations. The RDP is concentrated funding and using this measure would further concentrate the doctoral population in fewer universities, regardless of student or employer wishes.

Loans would have greatest impact in areas of greatest need - either on the basis of discipline or current public funding allocations for doctoral study. There is no evidence that need is aligned with high RDP QR. To meet employers' demand for high level skills across a breadth of disciplines, loans would need to be available in all areas of research strength. These are not necessarily the same as QR strength.

QR is weighted by discipline, and skewed towards STEM subjects. Institutions with research predominantly in the arts, humanities, education and business will receive less QR than those with large science departments. This may mean that allocation on the basis of QR would result in specialist institutions (e.g. in the arts) being excluded from the loans.

Capping allocations at different institutions would also add significantly to the cost and complexity of the process, reducing value for money for the taxpayer.

Q10. Do you have any views on such a condition on institutions' eligibility in which loans would only be available to students wishing to study at HEIs that have been allocated a capped number of loan places? Please explain your answer and give evidence where possible:

As in our response to Q9, this would limit the ability of students from studying in areas of research excellence and according to employer demand.

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Imposing a numbers cap could cause preference towards allocating the places to traditional PhDs over Professional Doctorates, with a direct impact on meeting employers' demand for advanced skills.

Funding should follow the student, not the institution. Since the loan will only contribute towards part of the costs of doctoral study, and the student will be accruing substantial personal debt through the loan, it would be inappropriate to impose a financially-based restriction on where that student may study. In particular, this could impose restrictions on students wishing to transfer institutions mid-study (usually to follow a supervisor). Loans are not tied to fees or maintenance, and may be used as the student wishes, so it is difficult to see how an eligibility tied to the institution can be justified. Furthermore, limiting the institutions at which students can study might in some instances require greater mobility than some students will be able to manage or afford.

There is a role for institutional eligibility in ensuring appropriate quality. This quality measure should put student experience at its heart. The Postgraduate Research Experience Survey (PRES), the national survey managed by the Higher Education Academy, is one such measure. Far better targeting of this resource could be achieved using appropriate data from PRES rather than RDP QR.

Q11. Does making the loan available for courses of up to 6 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?

No

Six year submission for part time doctoral students is what institutions aim for but progression through doctoral study is often not straightforward, particularly over the more extended part time study period, and circumstances outside of the doctoral student's control can impact on their progression (e.g. illness, work commitments, caring responsibilities). These can result in suspensions (pauses in study) or extensions (where the student is given longer to submit their thesis) to study.

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The Doctoral Loan scheme needs to bear these complexities in mind. Similarly, it should mirror the patterns of other public funding sources. Full-time Research Council PhD studentships are 4 years, and it makes sense to reflect this in the loans system. Therefore we suggest greater flexibility with a maximum period of eight years in which the loan could be made available.

Q12. The Government has a duty to ensure that payments to students are made in step with, rather than in advance of need. What can be done to ensure that students in receipt of a loan, who set out to complete their courses in a set period of time actually do so, so that payments are not made in advance of need if students take longer than intended, or longer than the six year completion limit? Please explain your answer and give evidence where possible:

Whilst it is appropriate to set a maximum period over which the loan payments may be profiled, it is difficult to see how a course length eligibility restriction could be used to enforce completion. A key role of academic supervisors is to support their students to complete in a timely manner.

The loan would need to incorporate sufficient flexibility to accommodate periods of approved suspension of study and changes to mode of study. Extensions and suspensions to study are approved via a formal process and recorded in the student records system, so it should be possible to re-profile loan payments accordingly.

Payments could be made in step with annual review/ progression milestones, which are a normal part of the internal administration of most doctoral programmes. Some PhD funders do request progress updates from HEIs, and loan payments could be contingent on progress. Some aspects of 'need' are clearly scheduled - e.g. fee payments - and loan payments could be similarly scheduled (although use of the loan is not prescribed).

Good supervision is also key. This requires clear expectations regarding supervision, appropriate training and support for supervisors. Consistent records of supervision need to be kept. An effective progression monitoring system is important to flag up areas for attention for students and supervisors,

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and detect significant problems while there is still time to address them. Student engagement more generally is important; activities and events that connect students with the research life of the University are likely to support this.

Q13. Should the limit on course length refer to the submission of the thesis, or use another benchmark for completion?

Submission of thesis

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. 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).

One reason why we advocate a maximum support period of eight years would be to cover those students who require some time on 'writing up status' before completion – and the loan package could be varied to reflect that status change. We would caution against a system that would offer no source of finance to students who need to revise their thesis after a Viva – this can often require considerable work, and it would offer poor value if students' prospects of gaining the degree were impeded at the final hurdle, after considerable investment in them over the course of the programme.

Q14. In your view, what is the main factor that impacts completion of doctorates?
Financial difficulties

All of the examples that have been listed can impact on a student being unable to complete their studies. There would typically be a compound effect of two or more of the examples given.

There is little formally reported evidence of the factors that impact the completion of doctorates, however, anecdotally the experience within Alliance

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institutions is that financial concerns and competing demands on time tend to have the greatest impact on timely completion.

We also know that a lack of financial support is the main reason given why doctoral applicants do not take up offers in the first place.

Q15. Do you have any views on the course eligibility for the loan?

We support the course eligibility proposed in the consultation document.

All courses leading to a doctoral degree should be eligible for the loan. From a university point of view this makes is much easier to manage and maintain; from a prospective student point of view it makes it simpler to understand funding options available to them and it makes it equitable across the PGR programmes. It may be appropriate, however, to impose a restriction on loan availability for the degree PhD by Prior Publication.

Q16. 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?

Yes

To avoid any practical issues the restrictions should be made clear. For example, it must be understood that a student undertaking an integrated 1+3/4 PGR programme (where the student applies for and is accepted onto one 'integrated' programme and they complete a masters programme in year one, before moving directly onto the PhD element without having to apply

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again) is only eligible for a PGR loan to cover the full length and not a PGT & PGR loan. And where a student completes a standalone masters and then applies for a PhD programme separately, they are eligible for the PGT & PGR loans.

In some institutions, PhD students are registered for an MPhil initially, before progressing to PhD registration after confirmation of satisfactory progress. In this situation, the intention at the outset is to transfer to PhD, and the MPhil would not normally be awarded. The loan system should accommodate initial registration for an MPhil where the expected outcome is a PhD, so that students are not accessing a masters loan followed by a doctoral loan for a single (doctoral) degree, or, conversely, so that students initially registered for an MPhil are able to access the doctoral loan.

The award of MPhil is a possible (but rare) exit qualification from doctoral study.

Q17. What current sources of finance do other bodies provide that might enable students to meet the costs of pursing doctoral study (i.e. on top of the doctoral loan)? Please explain your answer and give evidence where possible:

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. A list of the Top 500 Charities and Trusts that award funding can be found in the Alternative Guide to Postgraduate Funding.

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

Q18. How might HEIs and others provide new and innovative packages of support to help meet the costs of study not covered by the loan? Please explain your answer and give evidence where possible:

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There are a wide range of funding options already developed and continuing to be developed by HEIs, often working together with partners. For example, central and faculty-funded University Scholarships (full awards and fees only), fee waivers for staff completing PhDs, professional doctorates and industry funding, alumni discount on tuition fees, small conference/ research grants, means-tested scholarships, industrial collaborations, etc.

University-funded support packages could be aligned with the loan, and institutions could consider targeting disciplines where there is limited availability of third party funding.

Further attention should also be given to improving use of innovation funding for business to incorporate PhD study (for example Innovate UK's Knowledge Transfer Partnerships scheme as a springboard to PhD).

Q19. 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)? Please explain your answer and give evidence where possible:

University Alliance supports maximum flexibility in the design of doctoral loans. Loans should be able to be used as a 'top up' to any other public funding, since £25k is by no means enough to cover all living costs. Students should be able to draw on a basket of different funding sources to make ends meet.

Q20. 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?

No

We welcome the proposal to combine masters and doctoral loans into a single postgraduate loan, and to calculate repayments at 6% of income above the repayment threshold.

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Q21. Is there anything else we should take into consideration in the practical implementation of the doctoral loan product?

Yes

The timing of implementation: it is important not to leave it too late for universities to put in place new procedures or new internal funding opportunities. Giving limited notice could result in restricted opportunities for potential students.

The loan system also needs flexibility to accommodate different start dates (for the same 'course'), suspensions in study and changes to mode of study.

Consideration may need to be given as to how to monitor an individual's progress, given there are generally no formal academic milestones/ assessment points between conferment and submission of thesis. Options are to use annual enrolment as confirmation of continuing registration, or to impose additional reporting.

Q22. 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?

Yes

Government may wish to consider how periods of maternity leave will impact on loan payments. Students in receipt of RCUK bursaries are entitled to 6 months' paid maternity leave, and many university-funded bursaries are aligned to this.

In addition, clarity is needed on how the loan impacts on benefit entitlement. If the maintenance loan is classed as income the family may lost benefit entitlement and associated automatic rights (e.g. if getting income support means they automatically receive housing benefit). We would not want a loss of

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benefits to deter them from undertaking doctoral study which would, in the long run, make them more resilient and more likely to secure employment.

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