

Ms Paula Head-Fourman
Doctoral Loans Policy Lead
Doctoral Loans Consultation
Department for Education
Abbey 2, 5th Floor
1 Victoria Street
London
SW1H 0ET

Thursday 15 December 2016

Dear Ms Head-Fourman

Universities Scotland is the membership organisation representing Scotland's 19 Higher Education Institutions (HEI) and, in my capacity as Convenor of the Research and Knowledge Exchange Committee, I am writing to outline Scotland-specific consequences we have identified through the consultation process. I would like to note our broad agreement with the formal response from Universities UK (UUK) and therefore focus on the potential impacts in Scotland.

We are supportive of the funding for postgraduate doctoral loans being an additional resource allocation, as a Department for Education (DfE) loan instrument, as we would have significant concerns if the provision of doctoral loans had any implications for the availability of postgraduate doctoral studentships through the UK-wide Research Councils (and in future, UKRI)

Section 5.1. Features of the proposed doctoral loan

We note the intention that this loan is only available to English-domiciled students. This runs counter to the policy intent of widening access to higher skills and regional growth across the UK because it excludes suitably qualified individuals domiciled in the devolved nations. Further such a restriction could lead to geographical inequalities for UK employers thereby limiting the ability of all UK employers to meet their requirements for high level skills and to ensure the UK is the best place to innovate (policy rationale 3.3.a).

The consultation states that 'the loan would be available to individuals studying any Level 8 doctoral qualification'. This relates to Level 8 qualifications as defined by the Framework for Higher Education Qualifications in England – PhD level qualifications are Level 12 in the Scottish Credit and Qualifications Framework. This ought to be clearer in the consultation as not to inadvertently restrict student choice.

Section 5.2.c Possible Additional Eligibility Requirements

We support UUK's response to consultation question 10 highlighting concerns around a system with institutional caps. We consider the drawbacks outweigh benefits of a cap. An institutional cap via any mechanism may restrict access to higher level skills training (for

individuals and employers) and hamper regional growth. There would also potentially be an additional administrative burden without proportionate benefit.

It is most appropriate institutions are able to take decisions about the appropriate level of loans-funded students as per institutional circumstances, expertise, partnerships and priorities in order to enable a broadening and strengthening the research base (policy rationale 3.3.d.). We therefore agree that there should be no restrictions on course eligibility (section 5.2.e).

We recognise the UK Government needs to control total loans costs but would highlight other drivers in the system that will limit the capacity of HEIs to take additional students. One major consideration is the capacity of an institution to provide an excellent training environment and associated researcher development opportunities. The intent is that the proposed loan amount will not cover all the costs of study. Without an increase to the devolved portion of dual support (which includes researcher training support) there could be a significant restriction to HEI resource to take loan-supported students.

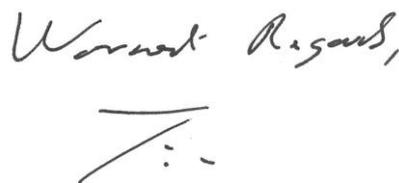
If UK Government implement an allocation mechanism, the use of Research Degree Programme (RDP) supervision funding is an inappropriate measure for a UK-wide system. This must be resolved prior to implementation of the policy. This measure is relevant to HEIs in England only. Scotland and Wales do not have a direct equivalent to RDP. Using this measure could inadvertently prevent non-English institutions from being eligible for loan-supported students and would not achieve the policy intent of loan portability.

Additional comments

We recognise the principle of non-duplicative funding, however, consider this loan instrument could be highly valued by RCUK fees-only students as an option for supplementing living costs. We would ask DfE to reconsider exclusion of RCUK fees-only students.

While we note the section on other sources of funding and the potential for innovative packages of support for PhD students developed in partnership, we would highlight the potentially significant burden of debt to students (building on debt accumulated at undergraduate, and potentially taught Masters, level) undertaking this route to a PhD. It is therefore vital that all partners (industry, charity etc.) are appropriately and sufficiently incentivised to support doctoral level training.

Universities Scotland welcomes the opportunity to comment on the proposed postgraduate doctoral loans and hope to see our concerns taken into account in the next stage of development.



Professor Sir Timothy O'Shea
Principal, University of Edinburgh
Convenor, Universities Scotland Research and Knowledge Exchange Committee

About Universities Scotland

We are a membership organisation working for the Principals and Directors of Scotland's 19 higher education institutions. We develop higher education policy and campaign on issues where our members have a shared interest

Further information

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