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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation Document

Support for doctoral study

Date of issue: 8 December 2017

Action required: Responses by 2 March 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Support for doctoral study

- Overview** This consultation seeks views on the proposed changes to support for doctoral study.
- How to respond** Responses to this consultation should be e-mailed/posted to the address below by **2 March 2018** at the latest.
- Further information and related documents** **Large print, Braille and alternative language versions of this document are available on request.**
This consultation document can be accessed from the Welsh Government's website at <http://www.gov.wales/consultations>
- Contact details** For further information:

Higher Education Division
Skills, Higher Education and Lifelong Learning Directorate
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email: HEDConsultationsMailbox@gov.wales
- Data protection** How the views and information you give us will be used.

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the

Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Contents

	Page
Foreword by the Cabinet Secretary for Education	1
What are the main issues?	2
Where are we now?	2
The case for change	2
Our proposal	8
Impact	13
Implementation	15
Our questions	16

Foreword by the Cabinet Secretary for Education

On 11 July 2017, I announced in Plenary that I had accepted the majority of the recommendations made by Professor Sir Ian Diamond in his recent review of student support. It is my intention to deliver, with only minor modification, the full Diamond package of reforms. I stated that I would introduce doctoral loans for students commencing study in 2018/19. This consultation seeks your views on the proposed approach.

A doctoral degree is the highest academic qualification that an institution can award. There is an increasing recognition of the importance of higher level skills to the economy and, therefore, of postgraduate study. Economic growth depends upon innovation. Highly qualified and skilled researchers play a key role in developing the knowledge to underpin new approaches, techniques and products and services in academia and beyond. Employers value the very high level of skill of those with a doctoral qualification.

I am proposing that eligible students, ordinarily resident in Wales, will be able to borrow up to £25,000. Students may use this to support their studies as they see fit. Providing support for doctoral study will ensure that finance is a less significant barrier to study, allowing students to pursue their studies to the very highest level. For the first time in Wales, a system of financial support will be available from Government for study at undergraduate, Master's and doctoral levels.

I look forward to receiving your views.

A handwritten signature in black ink, appearing to read 'Kirsty Williams'.

Kirsty Williams, AM

What are the main issues?

1. This consultation is about the provision of financial support to students undertaking doctoral study. The Welsh Ministers intend to make support available to students ordinarily resident in Wales¹, and are seeking views on a policy. The deadline for response is 23 February 2018.

Where are we now?

2. The Welsh Ministers make financial support available to undergraduate students in the form of grants and loans to enable them to meet the cost of fees charged by providers of higher education ('HE') and help meet living expenses. From the 2017/18 academic year, support is also available from the Welsh Ministers for students undertaking a postgraduate Master's course. This is a contribution to costs and is paid directly to the student. Students on postgraduate teacher training courses may also be eligible for student support. Support is also available to postgraduate students with disabilities under Part 13 of the Education (Student Support) (Wales) Regulations 2017. At present, only very limited support is available for doctoral study from the Welsh Government.
3. The Independent review of higher education funding and student finance arrangements led by Professor Sir Ian Diamond recommended that a bursary scheme be introduced for research students. The Cabinet Secretary for Education accepted this recommendation. It is not likely to be implemented by the 2018/19 academic year.
4. The Welsh Government's Sêr Cymru scheme provides some limited grant funding to universities in Wales to support doctoral study.
5. Doctoral students may also access support for their studies through a range of other sources, for example, employers, Universities, and the UK research councils.

The case for change

6. Making support available for undergraduate study has been the main policy priority for each of the UK administrations. Support is made available to ensure that those who are qualified by ability and attainment may access HE, and that individual economic circumstance is not a barrier.

¹ This document refers to students 'ordinarily resident in Wales' which is the term used in the regulations governing student support (for example, the Education (Student Support) (Wales) Regulations 2017 (SI 2017/47)). However, some statistics use the term 'Wales domiciled students', and as this is the term used in the relevant source statistics, that term is also used in this document.

7. There has, however, been increasing recognition of the importance of higher level skills to the economy and, therefore, of doctoral study.

Doctoral study²

8. A doctoral degree is the highest academic qualification that an institution can award following an agreed programme of study. Doctoral qualifications are at level 8 on the Credit and Qualifications Framework for Wales³. Registration periods for a UK doctorate are typically four years full-time or six to eight years part-time. A candidate is examined on the basis of a thesis, portfolio, artefact(s), clinical practice or other output which must demonstrate the relevant research question, critically evaluate the extent to which it has been addressed, and make an original contribution to knowledge. In the UK a doctoral qualification is awarded by reaching or exceeding the required level of achievement.
9. Doctoral degrees are awarded to students who have demonstrated:
 - the creation and interpretation of new knowledge, through original research or other advanced scholarship, which is of a quality to satisfy peer review, extend the forefront of the discipline, and merit publication;
 - a systematic acquisition and understanding of a substantial body of knowledge that is at the forefront of an academic discipline or area of professional practice;
 - the general ability to conceptualise, design and implement a project for the generation of new knowledge, applications or understanding at the forefront of the discipline, and to adjust the project design in the light of unforeseen problems; and
 - a detailed understanding of applicable techniques for research and advanced academic enquiry.
10. The registration period indicates a common understanding that typically a research project takes this period to complete; much shorter and it is unlikely to reach doctoral standard, except in exceptional circumstances; much longer and it is likely to be unnecessarily grand in scope or complexity for the award of the doctoral degree. It is possible to achieve a doctoral qualification in a much shorter registration period by a process known as 'PhD by prior publication'⁴.

² This section draws on the National Union of Students and Quality Assurance Agency's 'The UK doctorate: a guide for current and prospective doctoral candidates' for general background material (<http://www.qaa.ac.uk/en/Publications/Documents/Doctorate-guide.pdf>).

³ See <http://gov.wales/topics/educationandskills/qualificationsinwales/creditqualificationsframework/?lang=en/>.

⁴ Other titles exist but it will be referred to here as PhD by prior publication. PhD by prior publication differs from a traditional PhD (or equivalent) in that it is normally based upon research already undertaken (and published) before registration for the degree. Registration is typically for 12 months. There is little or no original research during the period.

11. The primary responsibility for academic standards and quality in UK HE rests with autonomous HE providers (universities) and research institutes. Many have the power to award their own degrees. However, they do so within the context of a national framework that underpins HE – the Quality Assurance Agency operates the UK Quality Code for Higher Education which sets out the expectations that all providers of HE are required to meet⁵.
12. The experience of undertaking a doctorate varies for every candidate; however, doctoral candidates all share the experience of creating knowledge through the practice of independent research and scholarship. This creation of new knowledge or of applying existing knowledge in a new way is not expected in the same way at undergraduate or taught postgraduate level. Doctoral candidates operate at a level of independence and self-direction that would not be expected of an undergraduate or taught postgraduate student.
13. Doctoral candidates learn about research – the means by which knowledge is created and extended – through undertaking independent research, under the guidance of one or more supervisors, and normally within a wider institutional, professional or subject-based research community. Holders of a doctoral qualification would be expected to be able to continue to undertake pure and/or applied research and development at an advanced level contributing substantially to the development of new techniques, ideas or approaches. They would also be able to make informed judgements on complex issues in specialist fields, often in the absence of complete data, and be able to communicate their ideas and conclusions clearly and effectively to specialist and non-specialist audiences.
14. Doctoral degrees fulfil a wide range of purposes. Whereas originally the purpose of acquiring a doctoral degree might have been seen solely as a way of gaining entry to the academic profession this is now just one of the many options available to doctoral graduates. To accommodate this diversity different doctoral qualifications have evolved. These include Doctor of Philosophy qualifications (PhD or DPhil), and professional doctorates, such as Doctor of Education (EdD) and Doctor of Business Administration (DBA).
15. All doctoral degrees prepare the candidate to make a contribution to knowledge through original and independent research. However, the context in which doctoral candidates undertake their research may vary between the different qualifications available, as well as the way the programme is structured. Doctoral candidates come from diverse backgrounds, with different aspirations and requirements in the way they study.

Participation in doctoral study

⁵ See <http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code>.

16. There were 3,895 students studying for a doctoral degree at Welsh higher education institutions ('HEIs') in 2015/16. Of these, 37% came from Wales before starting study, 30% came from outside of the EU.

Table 1

Doctoral enrolments at Welsh HEIs

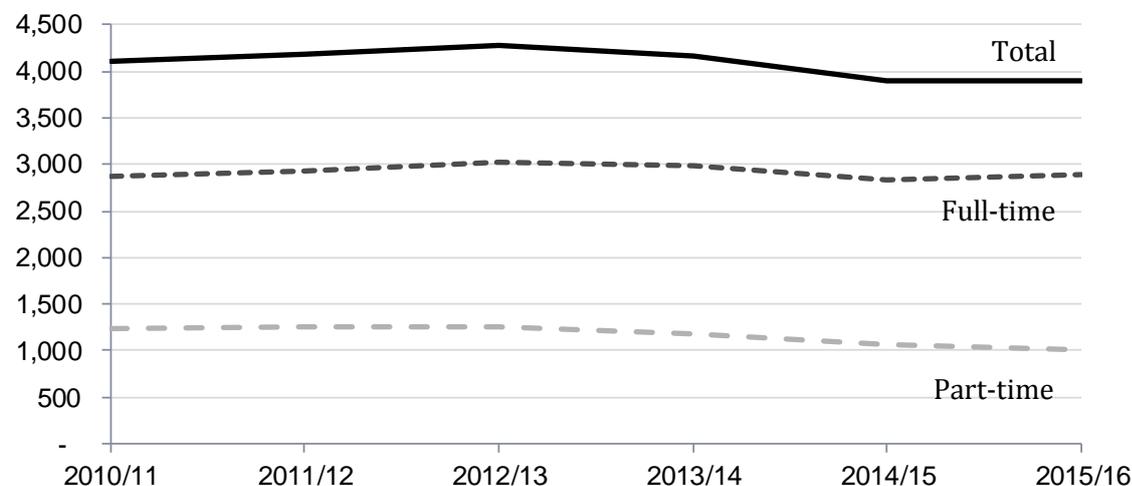
Domicile	Number	Percentage
Wales	1,455	37.4%
England	845	21.7%
Scotland	40	1.0%
Northern Ireland	10	0.3%
Guernsey, Jersey and the Isle of Man	*	*
Other European Union	395	10.1%
Non-European Union	1,150	29.5%
Total	3,895	100.0%

Source: HESA Student Record

17. The number of full-time doctoral students in Welsh HEIs has remained fairly constant for the last five years. Part-time doctoral students have decreased by a fifth over the same time. This is not representative of the overall UK trend. Over the same time, full-time doctoral enrolments in the UK increased by 15% and part-time doctoral enrolments by 1%.

Figure 1

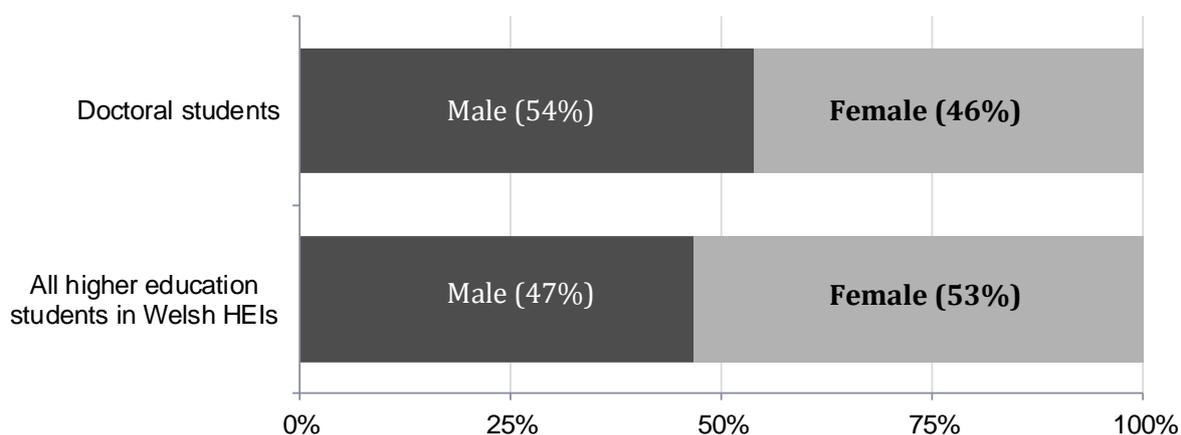
Doctoral enrolments at Welsh HEIs by mode of study



Source: HESA Student Record

18. Since 2010/11, around 46% of doctoral students in Welsh HEIs were female. This contrasts to the overall HE picture in Wales where, over the same time period, 53% of students were female.

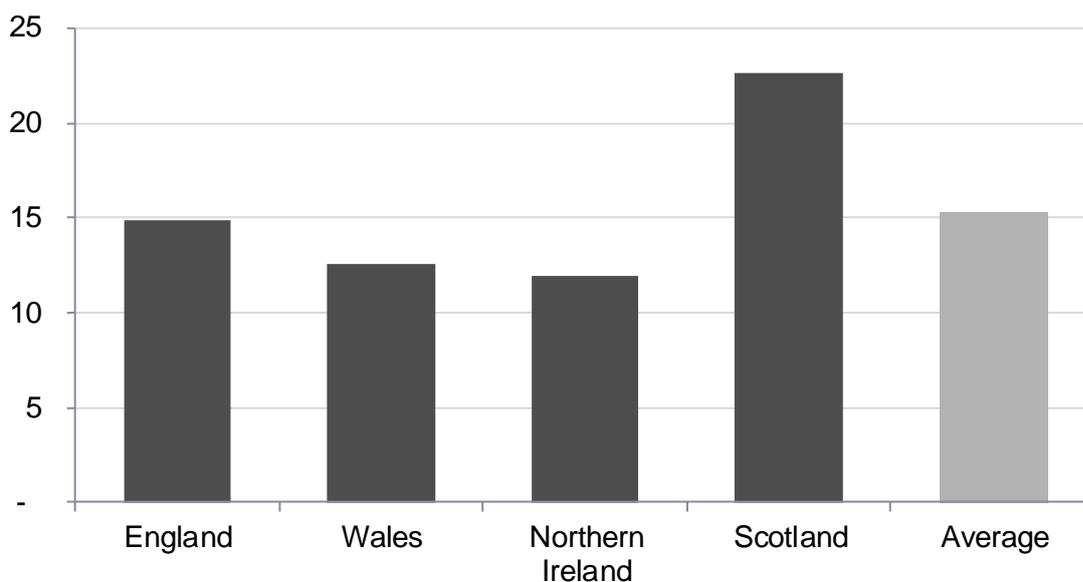
Figure 2
Gender of doctoral students at Welsh HEIs, 2015/16



Source: HESA Student Record

19. Doctoral enrolments per 10,000 of the population are lower in Wales than England or Scotland, though higher than in Northern Ireland.

Figure 3
Doctoral enrolments per 10,000 population, 2015/16

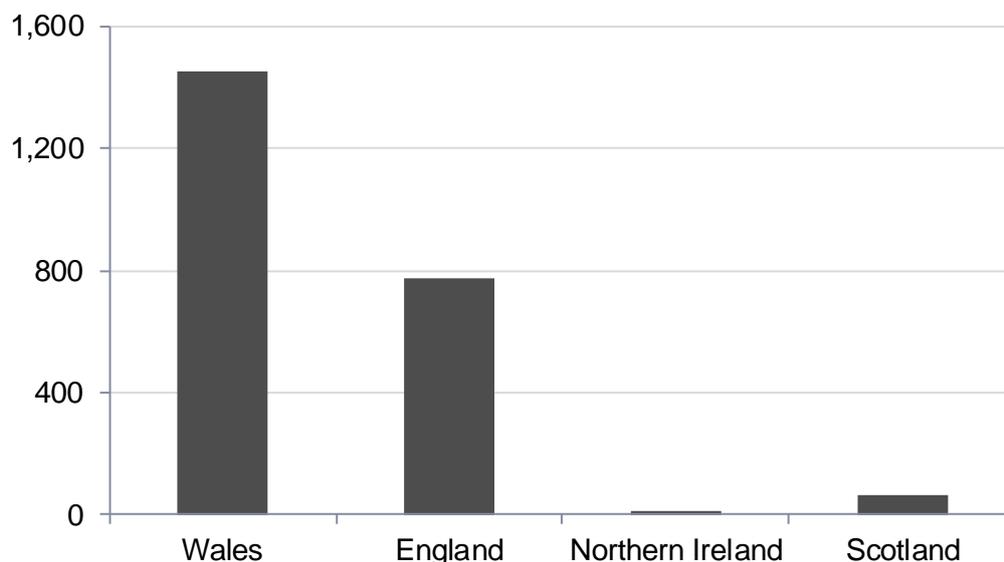


Source: HESA Student Record

20. Of 2,310 Welsh domiciled students studying doctoral degrees in 2015/16, 1,455 stayed in Wales, and around 775 went to England. In 2015/16, Wales was a net importer of doctoral students in the UK.

Figure 4

Welsh domiciled doctoral students by country of study, 2015/16



Source: HESA Student Record

Reasons for change

21. There are a number of reasons for introducing the proposed support for doctoral study.
- The 2017/18 academic year is the first in which support is available for postgraduate Master's study (other than for those with disabilities). Providing support for doctoral study would ensure that finance is a less significant barrier to study, allowing students to continue their studies at the very highest level. For the first time, a system of financial support will be available from Government for study at undergraduate, Master's and doctoral levels.
 - The Independent review of higher education funding and student finance arrangements led by Professor Sir Ian Diamond recommended that a bursary scheme be introduced for research students, noting that the Welsh Government should establish 'an ambitious programme to train a new generation of researchers in Wales'⁶. The Cabinet Secretary for Education

⁶ See <http://gov.wales/topics/educationandskills/highereducation/reviews/review-of-he-funding-and-student-finance-arrangements/?lang=en>.

accepted this recommendation. The proposed loan forms part of this programme.

- As noted in the recent Welsh Government consultation on support for postgraduate study⁷, there is an increasing recognition of the importance higher level skills to the economy and, therefore, of postgraduate study. The Welsh Government believes this extends to doctoral study and qualification. Economic growth depends upon innovation. Highly qualified and skilled researchers play a key role in researching the knowledge to underpin new approaches, techniques and products and services in academia and beyond. Employers value the very high level of skill of those with a doctoral qualification.
- Statistics (figure 4) show that 63% of Welsh domiciled doctoral students choose to study in Wales, an encouraging figure. Providing support for study and increasing the number of doctoral students in Wales will lead to greater capacity for industry/academia collaboration, with the benefits that brings.
- Those with doctoral qualifications often operate in a global labour market. Increasing the number graduating from Welsh universities may further improve the standing of Welsh HEIs and Wales in the world. It may also lead to greater employment of doctoral graduates in Wales.
- Doctoral students are the lecturers and professors of tomorrow. Increasing the number of students can only improve the position of Welsh HEIs. HEIs may, in turn, be better placed to expand and develop their research programmes.
- Doctoral students traditionally play an important and active role in their institution during their studies, contributing to research activities and supporting undergraduate teaching. Increasing the number of doctoral students in Welsh institutions should provide positive knock-on effects in research departments and their outputs. There may be synergies with the Sêr Cymru programme.
- Competition for existing doctoral funding is fierce, suggesting an unmet demand for doctoral study. Loan support will enable individuals to make informed career decisions, less constrained by the immediate availability of funding.

Our proposal

⁷ *Support for postgraduate study and part-time engineering, technology or computer science degrees*, WG27990, Welsh Government, March 2016
(<https://consultations.gov.wales/sites/default/files/consultation-documents/160303-postgrad-consultation-doc-en.pdf>)

22. The policy intention is for the eligibility criteria for the proposed doctoral support to broadly reflect the eligibility criteria for the undergraduate and postgraduate Master's support that is available from the Welsh Ministers, to ensure consistency in policy and continuity for the student.
23. It is proposed that support will be by way of a £25,000 loan made to the student. This may be used by the student to support their studies in whatever way they see fit. Like the postgraduate Master's loan currently available under the Education (Postgraduate Master's Degree Loans) (Wales) Regulations 2017, it will be a contribution to the costs of pursuing doctoral study (rather than to specifically cover tuition fees or living costs). It is proposed that the loan will be available to eligible UK nationals ordinarily resident in Wales and other students that meet the loan's eligibility and residency requirements in place at the time. The loan will be available for students beginning a doctoral programme in academic year 2018/19. The loan will not be retrospective – it is proposed that doctoral students who begin their programme before the 2018/19 academic year will not be eligible for support. This follows the usual convention for student support where a 'clean line' is drawn between cohorts to avoid inconsistent policy decisions about extending eligibility for support, and to ensure effective implementation.
24. The Welsh Government is proposing that the support system will reflect the UK Government's Department for Education's proposals for a doctoral support system for students ordinarily resident in England. There are several reasons for this:
 - providing a similar package of support ensures that students who are ordinarily resident in Wales are treated at least as favourably as their peers in England;
 - it enables the Student Loans Company (SLC) to implement a similar administrative approach across the two countries, ensuring cost effective and timely implementation; and
 - in a period of continuing fiscal austerity, it ensures resources from Treasury are used to best effect.
25. The key features of the proposed loan are listed below.

The student

26. Available to those settled in the UK and ordinarily resident in Wales, including refugees and their family members who are ordinarily resident in Wales, and those with leave to enter or remain and their family members who are ordinarily resident in Wales. It is intended that this support will also be available to those who are usually eligible for support by virtue of the UK's membership of the European Union.

27. Fifty-nine years of age or younger on the first day of the first academic year of study. Section 13(1) of the Equality Act 2010 prohibits direct discrimination on the grounds of age. However, section 13(2) of that Act provides that a person (“A”) does not discriminate against another person (“B”) on grounds of age if A can show that treating B less favourably than others is a proportionate means of achieving a legitimate aim. It is not the purpose of the proposed loan to facilitate the uptake of doctoral programmes by students who are pursuing their studies purely for personal interest and without any particular intention to return to the workplace. This may be a particular issue amongst older cohorts. They may rightly calculate that they would not have to repay any of the loan, particularly if the repayment of the loan is income contingent. The Welsh Government recognises that whilst such doctorates may be valuable in themselves, in that doctoral research has a value irrespective of the age of the student undertaking the research, the Welsh Government has a duty to ensure value for money for the taxpayer when dispensing public money. The proposed age restriction is likely to be important in mitigating the risk that the loan is disproportionately taken out by older students who will be unlikely to repay the loan in full or make significant repayments. Large numbers of older students taking out the loan with a low level of repayment would reduce value for money for the taxpayer. Older students would have a limited number of years in which their skills would be available to the economy. As one of the policy aims of the loan is to increase high level skills for the economy, there is a value for money argument to be made for targeting the loans to those earlier in their working life. At present, the Welsh Government considers that this age restriction would reduce the risk of the loans offering low value for money for the taxpayer. It considers that the proposed age restriction, which reflects the age eligibility criteria for the postgraduate Master’s loan, strikes the best balance between access and affordability and is a proportionate way of mitigating the risk of low value for money.
28. Must not already hold a doctoral qualification or have an equivalent or higher level qualification (including qualifications obtained outside the UK). This reflects a similar criterion applicable for postgraduate Master’s loans.
29. Eligible students will be able to take their loan to any UK university offering a designated doctoral programme.
30. Studying for a Level 8 doctoral qualification.

Duplication of Government funding and eligibility for support

31. Not all students will be eligible for support. In particular, the Welsh Government wishes to ensure that there is no duplication of Government funding.
32. Those in receipt of studentship funding from any of the seven UK Research Councils (whether full or fees only) will not be eligible to receive a loan.

33. Other direct forms of Government support for maintenance and fees costs, including any salary contributions or fees provided by the NHS for the purposes of doctoral study, will also mean a student is not eligible for the proposed loan support.
34. The Welsh Government's response to the Diamond review accepted 'for future implementation' a recommendation to introduce a scheme to fund 150 research scholarships per year. This is unlikely to be available for academic year 2018/19. The eligibility criteria for this scholarship scheme are yet to be determined. To avoid duplication of funding, it may be that students with an existing doctoral loan in place if and when a scholarship scheme launches will not be eligible for a scholarship.

The course

35. Doctoral courses offered by providers based in the UK with Research Degree Awarding Powers.
36. Substantially provided in the UK.
37. Full-time and part-time courses between three and eight years in length. The Welsh Government wishes for the availability of the loan to widen participation in doctoral study, including for students studying on a part-time basis and who might have struggled to access financial support before. Full-time doctoral courses are typically three or four years in length. The proposed maximum of eight years would cover courses in which a part-time doctorate includes a six-year period of research with an additional 'writing-up' year. The Welsh Government considers that an eight year period will cover all but a small minority of full-time and part-time doctoral courses available.
38. Courses commencing in academic year 2018/19 or later (i.e. on or after 1 August 2018).
39. PhD by prior publication will not be eligible. The registration period is short and the individual is unlikely to be actively studying, which does not justify the proposed package of support. Similarly, higher doctorates, which are often honorary, will also not qualify for support.

Loan

40. Eligible individuals would be able to borrow up to a maximum of £25,000 over the period of the doctoral programme.
41. The loan is intended as a contribution to the cost of study, rather than to specifically cover tuition fees or living costs. The fees that HEIs in the UK

charge for doctoral programmes are not regulated. Fee levels and costs of living also vary across the UK. A key policy aim is to close the finance gap for individuals considering a doctoral degree.

42. Eligibility will not be based on a means test.
43. Payments made in tranches across the number of years of the doctoral programme.
44. Paid to the student upon confirmation of attendance by the HEI.

Repayments

45. The Welsh Government is proposing that the repayment arrangements for the doctoral loan will reflect the arrangements now in place for postgraduate Master's loans.
46. Loan interest will be calculated at RPI+3% commencing when payment is made to the student.
47. Repayment will be income contingent and in line with the repayment threshold of the undergraduate and Master's loans, currently set at £21,000.
48. For those students with debt from a Master's loan, the intention is for repayment to be a single repayment of 6% of income in excess of the repayment threshold covering both loans i.e. the Master's and doctoral loan balances will be treated as a single loan balance. The repayment rate for those with a Master's loan only will remain at 6%.
49. Repayment will be concurrent with repayment of other outstanding student support debt. The combination of the loan with other postgraduate loans will ensure that graduates in repayment with an undergraduate loan continue to face a maximum 15% contribution from above-repayment threshold income.
50. Any outstanding doctoral loan balance would be written off 30 years after the point a borrower becomes liable to begin repaying a loan.
51. For courses which are 4 years or less, students will enter repayment status on 6 April following the course end date. For courses which are longer than 4 years, students will enter repayment status following the fourth anniversary of the course start date. Students who withdraw from their course will enter repayment status on 6 April following their withdrawal date. Students will not be required to make loan repayments unless their income exceeds the repayment threshold.

52. It is proposed the loan be administered by the SLC and that the loan will be recovered by HMRC for those in the UK tax system, and by SLC for those resident overseas.
53. Doctoral courses will have to be designated by the Welsh Ministers if students are to be eligible for support. It is anticipated that doctoral programmes offered by those institutions with Research Degree Awarding Powers^{8 9} will be designated.

Impact

54. The principal impact of this proposal will be to expand the number of people studying for and achieving a doctoral qualification. This will increase the skill level of the workforce, assist in meeting the demand for higher skills, benefit the economy and strengthen the position of the Welsh HE sector. The Welsh Government anticipates an increase in the number of doctoral students. However, additional debt may not be welcomed by some students and will offset some of the potential gains.
55. Support for doctoral study will contribute to two of the seven well-being goals – ‘a prosperous Wales’ and ‘a more equal Wales’ – of the Well-being of Future Generations (Wales) Act 2015.

Benefits

56. The Welsh Ministers believe that this policy:
- will lower a key barrier – finance – to doctoral study;
 - will increase the demand for doctoral education, improving skills at the highest level which in turn will benefit the economy;
 - will increase the number of doctoral students at Welsh HEIs, providing benefits to both students and institution;
 - should be straightforward to implement.

Costs

57. This policy is not without cost:
- there may be an increased cost to the Welsh Government via additional ‘RAB’ charges¹⁰;

⁸ For more information on degree awarding powers, see <http://www.qaa.ac.uk/assuring-standards-and-quality/daput>.

⁹ Institutions in Wales with Research Degree Awarding Powers are Aberystwyth University, Bangor University, Cardiff University, Cardiff Metropolitan University, the Open University in Wales, Swansea University, University of South Wales and University of Wales, Trinity St David.

¹⁰ RAB (Resource Accounting and Budgeting) charges predict the ‘subsidy that the Government implicitly pays to students through favourable terms connected to student loans’ (*Student Loans. Third*

- there will be implementation and recurring administrative costs; and
 - students will incur debt, which is likely to be additional to that incurred during undergraduate and, possibly, postgraduate Master's study.
58. Public investment in higher education is justified by the positive externalities, or spill overs, associated with it. There is some evidence that those with doctoral level qualifications generate positive externalities. Vitae¹¹, for example, found in a workplace context that of the doctoral graduates who responded to their research:
- 91% believed their doctoral experience enabled them to be innovative in the workplace;
 - 88% believed their doctoral experience enabled them to make a difference in the workplace;
 - 78% believed their doctoral experience enabled them to influence the work of others; and
 - 52% believed their doctoral experience enabled them to change organisational culture and/or working practice.
59. CFE Research found similar effects in their 2014 study¹².
60. The private returns, the benefits to the individual, of doctoral study have also been documented. The London School of Economics found in 2010 that postgraduates with a Master's and those with a PhD earn on average 15% and 23% more than a graduate with a first degree¹³. Vitae in their study of the early career progression of those with doctoral degrees found that median earnings three and a half years after graduation were £35,000, compared to £32,000 for those with Master's qualifications and £25,000 for those with undergraduate qualifications, premia of 9% and 40% respectively.
61. The difference between those with Master's qualifications and those with doctoral qualifications – 8% on the LSE study, 9% on the Vitae study – shows that the additional private returns to study are positive but not nearly as large as those between undergraduate and Master's study.
62. As noted above, the Welsh Government bears a cost by the provision of loans via the RAB charge. Improved earnings for doctoral students are likely to mean

report of session 2014-15, p.9. House of Commons Business, Innovation and Skills Committee, July 2014). This includes those loans that are never repaid as well as the fact that the rate of interest charged is lower than the Government's cost of capital.

¹¹ What do researchers do? Early career progression of doctoral graduates 2013.

<https://www.vitae.ac.uk/vitae-publications/reports/what-do-researchers-do-early-career-progression-2013.pdf/view>

¹² The impact of doctoral careers, policy briefing. <http://www.rcuk.ac.uk/documents/skills/timodc-policy-briefing-pdf/>

¹³ The social composition and future earnings of postgraduates. LSE for the Sutton trust.

https://www.suttontrust.com/wp-content/uploads/2010/03/Sutton_Trust_Postgraduate_report_01032010-1.pdf

the RAB charge is lower than that for undergraduate and Master's provision. Nevertheless, there may be a possibility that the availability of loans will mean that at least some of the expansion in demand for doctoral study will come from those who will study in areas with a lower than average return. This might come about if current research council funding is generally more readily available to support study in areas which attract a higher private return. Students with no or limited access to these grants may turn to loan funding, skewing the earnings profile of these graduates and raising the RAB charge.

63. There is a further potential impact of concern to the Welsh Government. The current system of competitive grants ensures that only proposals of the highest quality are accepted by degree awarding institutions. There may be some risk that ready access to loan funding could see these standards jeopardised. This would not be in the interest of the student, the institution, the higher education sector or the Welsh Government.
64. The Welsh Language Standards (No 1) Regulations 2015 (SI 2015 No. 996 (W. 68)) establish standards of conduct concerning the Welsh language which the Welsh Ministers must comply with. This policy is not thought to have a significant impact, positive or adverse, on the opportunities for persons to use the Welsh language, or on treating the Welsh language no less favourably than the English language.

Implementation

65. Following consultation and subject to responses received we intend to implement new arrangements for the 2018/19 academic year. Subordinate legislation will be required and, again, subject to responses received, we anticipate laying draft regulations before the National Assembly for Wales in 2018 with a view to enabling applications for support to be made to the SLC in a similar timescale to that which operates for postgraduate Master's loans support.

Our questions

1. Do you agree that support should be provided for doctoral study?
2. Do you agree with the proposed support package as outlined? Is there any aspect you would change? Why?
3. The Welsh Government considers that 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 set out in section 4 of the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Do you think that there are other issues that the Welsh Government should be aware of which would impact on the take-up of the proposed loan by those with any of the protected characteristics? If so, what steps might the Welsh Government take to mitigate any negative impact?
4. Do you think that this policy, if implemented, would have effects (whether positive or adverse) on:
 - opportunities for persons to use the Welsh language, and
 - on treating the Welsh language no less favourably than the English language?
5. How might the proposed policy be formulated or revised so that it would have positive effects, or increased positive effects, on:
 - opportunities for persons to use the Welsh language, and
 - on treating the Welsh language no less favourably than the English language?
6. How might the proposed policy be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects, on:
 - opportunities for persons to use the Welsh language, and
 - on treating the Welsh language no less favourably than the English language.
7. Some potential adverse impacts have been highlighted at paragraphs 36 and 37 including a fall in quality/standards and/or increased study in subject disciplines which may have a lower economic return. What is your view on the likelihood of these occurring, and how significant do you think the impact could be?
8. Do you think that access to funds for doctoral study should be limited to particular types of award and/or subject of award? For example, limited to cases where there is a demonstrable direct or indirect public return? This could include:

- a) Limiting funding for doctoral study to situations where the supervisor was submitted in a research group that achieved above a threshold in the Research Excellence Framework (REF).
- b) It could also include limiting funding to subject areas where there is an evidenced need for greater numbers of individuals with qualification in this area in Wales as evidenced by HEFCW or its successor body working with the Regional Skills Partnerships. This approach might lead to the encouragement of doctorates in science, technology, engineering, economics, education, medicine and maths.

9. Are there any other issues about our proposal that you would like to raise?