

Consultation on Part-time Maintenance Loans

Draft UALL response

For details of the proposals and consultation see:

<https://www.gov.uk/government/news/more-support-planned-for-part-time-and-doctoral-degree-students> Please note that the survey itself has an additional question at the beginning asking for the respondent's e.mail. This means that the numbering of the questions, reflected below, is one ahead of those used in the consultation document.

2. Are you answering on behalf of an organisation, or as an individual?

Organisation: Universities Association For Lifelong Learning (UALL)

3. If you are answering on behalf of an organisation which of the following stakeholder groups do you/your organisation belong to?

University representative group

6. Restricting the availability of the maintenance 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 an effective way of mitigating this risk?

Option from yes/no drop down menu: "Yes"

UALL supports the principle that there should be equity between full-time and part-time undergraduates and on this basis accepts that there should be a common upper age limit for eligibility to maintenance loans.

More fundamentally, however, UALL is an advocate for learning to be accessible in all stages of life, including for older students, and we urge Government to adopt more progressive policies for student finance that are informed by proper recognition of the wider benefits of HE in terms of personal and social good and a broader, more realistic, financial modelling that takes account of such factors as impact on health and social care budgets.

7. Students may qualify for support for part-time courses lasting up to four times the period required to complete a full-time equivalent course. As such the maximum length for eligibility would be 16 years in total (equivalent to a four year Full Time Equivalent course studied at 25% intensity each year and for the duration of the course). The older the student, the fewer the number of years they will have to repay the loan. In your view, which of the options relating to an age eligibility below would best achieve the Government's aims - broadening and strengthening the skill base and addressing employer demand for high level skills - whilst also providing good value for money for the taxpayer?

Option from drop-down menu: "An age restriction of 59 and under"

This is as good a balance as any given the statement above of the Government's aims. If there are to be age eligibility criteria it is appropriate that these should be the same for part-time as for full-time undergraduates.

8. What are the benefits, issues and unexpected consequences which may result from providing loans according to a banded intensity approach?

It is appropriate that there should be some proportionate relationship between intensity of study and the maintenance loans entitlement. This may encourage and enable part-time students to study more intensively and thereby help them to maintain momentum and support retention. (Part-time students are typically adults for whom life circumstances external to study have a major impact on attrition. Study over a longer period makes it more rather than less likely that such circumstances could arise ahead of completion of the programme.)

However, UALL questions whether a banded approach is the best way to achieve this proportionality and would favour a system modelled on that already used for part-time tuition fee loans in which the actual credit studied by an individual serves as the calculator. This would have the advantage of avoiding any "cliff edges" and would foster flexibility and innovation in part-time HE rather than simply mapping onto, and then locking us into, the patterns of delivery that already exist.

9. With particular regards to any operational and delivery complications for students, providers, the SLC, or otherwise which approach outlined do you believe would be most appropriate?

If banding is to take place (please see our response to question 8), UALL favours proposal (b): Fractional Bands

In our view the advantages of this outweigh any additional administrative complexity. The rationale for this, as outlined in the consultation, is supported in the experience of UALL member institutions i.e.

- ◆ it maps more fluently than proposal (a) onto actual patterns of part-time delivery;
- ◆ there is a less sharp "cliff edge" for students at the boundaries of each band and less impact for those adjusting intensity of study.

10. What are the benefits, challenges and impacts upon demand associated with extending maintenance loans to part-time undergraduate distance learning courses and what checks and balances would be appropriate to manage these challenges?

UALL supports the inclusion of distance learning in the eligibility for part-time maintenance loans and agrees that this would bring "strong added value" to "part-time students, employers and the wider economy". Such provision is a vital part of the flexible offering of HE to adult learners wishing to return to study and is the best, and in some cases only, option for these students (e.g. those in rural areas or distant from an HEI; those whose work, family or caring responsibilities preclude travel to study or require them to study at times of their own choosing; those whose choice of programme is not available to them locally; those with a disability or long-term health condition).

In terms of checks and balances we propose that the measures already used for part-time tuition fee loans in relation to distance learning programmes can also be applied to part-time maintenance loans.

11. What are the benefits and challenges associated with extending maintenance loans to part-time undergraduate Level 4 and 5 courses and what checks and balances would be appropriate to manage these challenges?

UALL strongly urges the inclusion of level 4 and 5 courses in the eligibility for part-time maintenance loans. Our reasons are as follows:

- ◆ full-time students on such programmes are eligible for maintenance loans and there is no justification for introducing less advantageous arrangements for their part-time peers;
- ◆ many adult learners, especially those from widening participation backgrounds, prefer to build their learning incrementally or to register initially on a sub-degree rather than commit to a full-honours programme;

- ◆ the incremental pattern of HNC, HND, Foundation Degrees and top-up degrees is particularly suited to work based learning and continuing professional development;
- ◆ there would be a skewing of HE provision as students, who would otherwise have chosen a sub-degree, register for a full degree in order to be eligible for a maintenance loan thereby increasing the vulnerability of those areas of part-time provision that have already seen the sharpest drop in part-time enrolments (REFERENCE).

12. Should means testing of any sort be applied to this part-time maintenance loan product?

Yes

13. If yes, would replicating the existing means test arrangements currently used for dependent and independent students claiming the full-time maintenance loan product be the most suitable approach, or should a different approach be applied?

It would be equitable and administratively desirable for the same means testing arrangements for maintenance loans to apply both to full-time and part-time undergraduates. This should include the same terms that currently apply to full-time maintenance loans in which income from work is not taken into account unless the student is seconded by their employer.

14. Given the specific features of this policy including: the length of part-time courses and the flexibility of distance learning, the Government's commitment to delivering value for money, and the overall Higher Education loan landscape, do you have any comments about the unintended policy consequences, practical implications and/or possible changes in life chances, which may arise as a result of this policy?

As an organisation dedicated to the furtherance of lifelong learning in higher education, UALL is fully in support of this policy as a welcome measure which will help to promote part-time undergraduate study and begin to halt, better still reverse, the dramatic decline of recent years in part-time registrations. The one caveat to this is the lack of attention given to the impact of the proposed policy on those who rely on benefits. Failure to address this satisfactorily would seriously undermine the intentions of this initiative and is likely to deter, rather than promote, participation of the least advantaged in part-time higher education. We make this point more fully in answer to question 17.

The existing lack of equity in maintenance support between full-time and part-time study has already had the effect of artificially skewing registrations amongst adult learners away from part-time provision and encouraged HEIs to reflect this in their programme offer. It would be good to see this shift reversed so that students and providers can make decisions that are in the best interests of adult learning without the distortions produced by the currently inequitable support arrangements.

15. What safeguards and controls should be in place as a proportionate and effective measure to ensure that this loan product provides value for money to the taxpayer?

We would expect the same safeguards to apply as currently pertain to maintenance loans for full-time undergraduates.

16. Are there other issues the 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 the Government take to mitigate any negative impact?

Full consideration is required of the impact of this policy on eligibility to benefits for disabled students. This is part of a wider concern which we have raised in answer to question 17.

17. Is there anything else we should take into consideration in the design of the part-time maintenance loan product?

(a) Impact for those on benefits

There are serious questions to be considered in relation to how the policy might impact on the continuing entitlement of part-time students to benefits. Part-time study is a vital means of access to higher education for adults from the least advantaged backgrounds and this will include those who are currently reliant on benefits and looking to build their capabilities for employment through study. The whole intention of this policy would be jeopardised if students on low/vulnerable incomes were to be deterred from embarking on part-time higher education because they would lose the benefits on which they and their families rely or see these transformed into loans.

(b) Impact for those on Higher and Degree Apprenticeships

There is need for clear articulation of eligibility for student maintenance loans for learners who are registered for higher and degree apprenticeships.

(c) Retrospective Changes to Loan Arrangements

This extension of funding through loans brings into sharper focus the negative impact that changes to repayment arrangements can have on financially vulnerable, widening participation students. The effect is to reduce confidence and readiness to engage in higher education and thereby undermine the government's agenda for social mobility.