

Evolution of Devolution: how higher education policy has diverged across the four nations of the UK

Edited by Rose Stephenson



Higher Education Policy Institute



THE
EDUCATION
GROUP
LONDON

HEPI Report 181

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Acknowledgements

My grateful thanks go to the authors of this collection for their rich knowledge on the subjects of devolution and higher education, to Edward Hicks, House of Commons Clerk, for his in-depth knowledge and guidance and to Gavan Conlon, Partner at London Economics, for explaining the economics.

My thanks as always to my colleagues, Carole Cox, Emma Ma, Josh Freeman, Lucy Haire and Nick Hillman for their thoughts, guidance and support with this collection. Errors and omissions remain mine.

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Foreword

The Education Group London

A Diverging Landscape of Higher Education Policy Across the Home Nations

The United Kingdom, once a mainly unified entity in terms of higher education policy, has witnessed a significant divergence in recent decades. The devolution of powers to Scotland, Wales, and Northern Ireland at the turn of the century has led to a fascinating experiment in policy innovation, resulting in four higher education systems charting their own course, shaping distinct approaches to funding, access and institutional autonomy. This collection of essays delves into the nuances of these diverging paths, examining the implications for students, institutions and wider society. It explores how historical legacies, political ideologies and socio-economic contexts have influenced the unique pathways each nation has taken. From tuition fees and student finance to widening participation and research funding, this publication will examine the key areas where the four nations have diverged.

With each of the home nations now having a parliamentary member responsible for higher education, there is potential for even more divergence over the coming years as each nation seeks to differentiate itself. By exploring the distinct policy choices made in each, we can gain valuable insights into the complex interplay of political, economic and social factors shaping our higher education landscapes. Too often the UK higher education system has been internationally homogenised into what happens in England. This complication makes clearer some of the significant and important ideological differences that arise from the histories and achievements of each home nation in the UK and offers a comprehensive analysis of the key areas where divergence has taken hold.

As we navigate the ever-changing landscape of higher education, understanding these national variations is crucial. This publication provides a timely and thought-provoking exploration of the diverging trajectories from the four nations of the UK, offering valuable lessons for policymakers, academics and students alike as well as providing thoughts for employers,

governments and society on how the benefit from graduate level education can be used to enable positive societal impacts as well as economic growth and benefits.

TEG London is an established, full-solution HE provider.

Introduction

Dr Lucy Hunter Blackburn

Higher education in the UK still bears the imprint of its radically different origins in each constituent part. Even so, by the late twentieth century, systems and practices had converged in many respects across England, Scotland, Wales and Northern Ireland. It was against this background of divergence and convergence that the new Scottish Parliament, National Assembly for Wales (now Senedd) and the Northern Ireland Assembly were established as the century ended.

Immediately before this, for many areas of domestic policy, day-to-day matters were often administered and decided separately for each of the devolved nations under UK political oversight. Thus, the Secretary of State for Scotland, a member of the Westminster Parliament and a UK government minister, made certain decisions supported by UK civil servants working in the Edinburgh-based Scottish Office. In higher education, he (no woman ever held this role) decided such things as: how much funding to allocate to the sector and looked to the Scottish Higher and Further Education Funding Councils to distribute it; some of the minutiae of student funding, which was in turn administered by a Scotland-only student funding agency; and when and how government should encourage institutional mergers. Similar but more limited delegation applied in Wales, while arrangements in Northern Ireland were different again. This led to some differences in policy and practice, such as Scotland's much greater use of short-cycle higher education, but always within the broader political constraints and priorities set by the United Kingdom Parliament and government.

The New Labour Government, which was elected in 1997, introduced political devolution to the three smaller nations, as a centrepiece of its programme. In Scotland, this responded to long-standing campaigning for more local political control within the UK, not least to contain pressure for full Scottish independence. Northern Ireland had previously had periods of political devolution; there, the re-opening of the Assembly at Stormont was a core element of the Good Friday Agreement. In Wales, similar dynamics existed as in Scotland, albeit in a weaker form, and the transfer of political control there was initially limited to actions not requiring primary legislation.

Across the three nations, separate referendums were held seeking endorsement for constitutional change. The votes in favour were as follows:

- there was a large positive majority in Scotland with 74 per cent on a 60 per cent turnout;
- there was a similarly large majority in Northern Ireland with 71 per cent positive vote on an 81 per cent turnout; and
- in Wales, the result was much closer – 50.3 per cent on a 50 per cent turnout.

Three separate Acts of Parliament at Westminster then established the details of each nation's settlement. In consequence, in 1999, what had previously been merely locally administered systems came under local political control.

In each nation, a first minister and supporting ministerial team are now drawn from the membership of a single chamber elected body, which in turn is chosen by proportional representation. All three legislatures can now pass primary and secondary legislation on any topic that is not explicitly retained at the UK level under the terms of their settlement, with some variation in the coverage, mechanisms and language used ('reserved' in Northern Ireland means something slightly different from Scotland). By extension, their ministers can also use relevant existing powers. In higher education, the UK-wide Research Councils remain outside the remit of the devolved legislatures. Otherwise, the limits on powers that affect higher education policy – and law-making – tend to be in other areas, such as immigration.

Continuing the funding arrangement established prior to 1999, each nation receives the bulk of its annual funding in a single block calculated using the 'Barnett formula', most of which can be used as politicians locally choose.¹ For Scotland, the transfer of an element of income-tax powers in recent years has complicated this, as do the mind-bending issues raised by combining student loan accounting with devolution. However, for the main part, decisions about the public funding of higher education, whether of institutions or students, are devolved. The four higher education funding bodies work collaboratively to assess the quality of higher education research on a UK basis and the results are then used differently in each

administration according to their own policy. Research Council grants are reserved and therefore an important exception here.

Responsibility for funding undergraduate students is mainly assigned by 'domicile', the student's place of residence prior to starting the course. Based in Glasgow, the Student Loans Company (SLC) has been transferred formally into the shared control of the UK, Scottish, Welsh and Northern Irish governments. The devolved administrations rely on the UK government's borrowing powers to generate funds for student loans and have no separate power to commission cross-UK income deductions through the tax system to collect loan repayments. Therefore, they are in practice locked into using the SLC to provide student loans, which have become an increasingly important part of funding the system over time in all four nations. They can negotiate new loan models for the students they support, but even that can be complex.

Practical entanglement has imposed constraints and preserved bonds in other ways. The movement of students in either direction between England and Wales has made devolved policymaking in the latter more complex. Terms and conditions continue to be negotiated at the UK level for academics and some other staff. In the pre-1992 universities the pensions scheme also continues to be managed UK-wide. Industrial disputes therefore cross borders. The management of undergraduate admissions through the Universities and Colleges Admission Service (UCAS), technical support and development through Jisc, the gathering of statistics through the Higher Education Statistics Agency (HESA), initiatives to address various forms of inequality through the Equalities Challenge Unit and its successor, Advance HE, and the Quality Assurance Agency are among those things that have continued to act as UK-wide glue. Equally, dealing with Brexit has been a shared experience across the sector, as has the impact of the UK Government's immigration policy.

Where does 25 years of devolution leave higher education in the United Kingdom? Financial pressures may come differently packaged, but they apply across the board, as do the more general aftermath of COVID and broader global cultural and technical shifts. Research funding (through the Research Councils, charities and business) provides a common driver of university priorities, though more applied research funding has come from the UK government in ways which may recognise their priorities

rather than those of the devolved administrations. Undergraduate students still move around the UK on much the same pattern as before. Even where policies look radically different, as with 'free tuition' in Scotland, for example, differences can be less absolute than may first appear: Scottish universities still charge fees to postgraduates, overseas students and those coming from other parts of the UK, and some others.

Still, the creation of new political centres of gravity in Edinburgh, Cardiff and Belfast has undoubtedly changed how the systems in each nation function, perceive themselves and relate to one another. Consciousness of difference may sometimes have exceeded reality, but it has also become a new reality in itself.

Devolution 101

Rose Stephenson

Devolution is the term used to describe the process of transferring power from the centre (Westminster) to the nations and regions of the United Kingdom.² The UK system of devolution is asymmetric in that different parts of the UK have different forms of devolution and varying degrees of power.³ The varying degrees of power have changed over time.

Scotland, Wales and Northern Ireland all have devolved executive and legislative powers. Executive powers include formulating and implementing policy. In the UK-wide context, the Executive is the Crown and the government, including the Prime Minister and Cabinet Ministers. Legislative powers include passing legislation. The legislature undertakes this. For UK-wide legislation, the legislature comprises the Crown, the House of Commons and the House of Lords.⁴

The legislatures in Scotland and Wales can pass primary and secondary laws, provided these laws are not reserved to Westminster. Policy areas that are not devolved, known as 'reserved' areas, remain the responsibility of the UK Government in Westminster. The legislature in Northern Ireland can make primary and subordinate legislation on 'transferred' (similar to devolved) matters and on 'reserved' matters with the consent of the Secretary of State for Northern Ireland.⁵ 'Excepted' matters remain the responsibility of the Westminster government.⁶

Devolved policy areas in Wales, Scotland and Northern Ireland include (among other areas):

- health and social care;
- education and training;
- economic development;
- transport;
- environment and planning;
- local government; and
- housing.

Each devolved nation has additional devolved powers. Northern Ireland has powers over charity law, justice and policing. Scotland has powers

over Stamp Duty Land Tax, abortion and some income tax policies. Wales has powers over income tax, stamp duty and the Welsh language. These lists are illustrative, and the complete list of devolved powers goes beyond those outlined here.⁷

Devolution at a glance

	Wales	Scotland	Northern Ireland
Act that established modern devolved powers	The Government of Wales Act 1998	The Scotland Act 1998	The Northern Ireland Act 1998
Legislative body	The Senedd, also known as Senedd Cymru, the Welsh Parliament or Cardiff Bay	The Scottish Parliament, also known as Holyrood	The Northern Ireland Assembly, also known as Stormont
Executive body	The Welsh Government	The Scottish Government	The Northern Ireland Executive
Current First Minister	Eluned Morgan, Welsh Labour	John Swinney, Scottish National Party	Michelle O'Neill, Sinn Fein
Current Deputy First Minister	Huw Irranca-Davies, Welsh Labour	Kate Forbes, Scottish National Party	Emma Little-Pengelly, Democratic Unionist Party
Number of other members of the government	12, (including the Deputy First Minister but excluding the General Counsel), who are appointed by the First Minister ⁸	23, who are appointed by the First Minister	8, who are nominated by the political parties in the Northern Irish Assembly
Members of parliament are known as....	Members of the Senedd (MSs)	Members of the Scottish Parliament (MSPs)	Members of the Legislative Assembly (MLAs)
Number of members of parliament	60 (40 constituency MS and 20 regional MS, 4 for each of the 5 regions)	129 (73 constituency MSPs and 56 regional MSPs, 7 for each of the 8 regions.)	90 (18 constituencies each elect 5 MLAs)
Secretary of State in Westminster	Jo Stevens (Labour)	Ian Murray (Labour)	Hilary Benn (Labour)
Electoral system	Additional Members System (until May 2026)	Additional Members System	Single Transferable Vote

Election processes

Scotland

The Scottish Parliament sits for a five-year term. Compared to the UK-wide election system (where elections have to be held no more than five years apart, but the Prime Minister otherwise determines the timing of elections) the election dates for the Scottish Parliament are relatively set and may only be varied by up to one month. However, a vote by two-thirds of the Parliament's members can dissolve Parliament and lead to an 'extraordinary' election.⁹

Each person in Scotland has eight representatives in the Scottish Parliament: one constituency Member of the Scottish Parliament (MSP) and seven regional MSPs. Scotland uses a mixed electoral system called the Additional Members System (AMS). This includes a 'first-past-the-post' vote for the one constituency MSP and a proportional representation system for the seven regional MSPs.

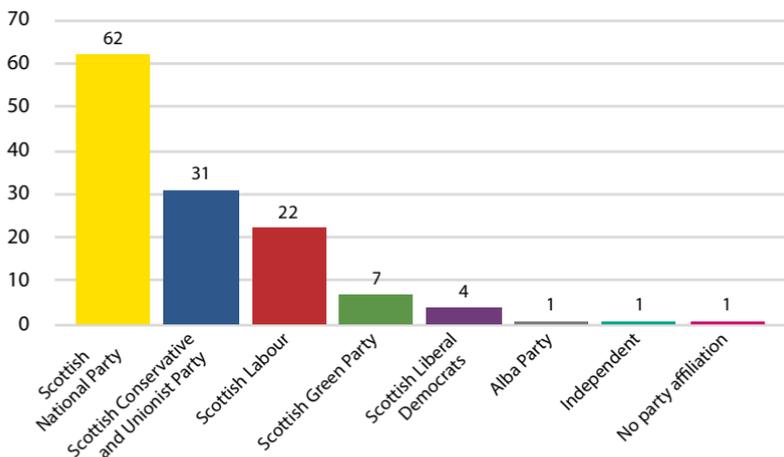
The first-past-the-post system is where voters select their preferred candidate. The candidate with the most votes wins. This is used in UK general elections. A 'proportional representation' system is where the number of members elected is based on the percentage of votes cast for each party. In Scotland, once the constituency MSP is taken into account, the D'Hondt method is used to allocate the number of MSPs per party in each region.¹⁰ In Scottish parliamentary elections, 16- and 17-year-olds can vote.

The party with the largest number of MSPs usually forms the Scottish Government, but coalition governments are common. The Scottish Parliament votes to elect the First Minister.

MSPs may hold a 'dual mandate'. This means they can be an MSP, where they sit in the Scottish Parliament and legislate on devolved matters in Scotland, and as an MP in Westminster (or a Member of the House of Lords). At the time of writing (October 2024) there are no MSPs who are also MPs in Westminster. From May 2021 until May 2024, Douglas Ross was the Conservative MSP for Highlands and Islands and also the MP for Moray.¹¹

The current composition of the Scottish Parliament (as of October 2024) is as follows:

Members of the Scottish Parliament, by political affiliation



Source: *The Scottish Parliament*¹²

Katy Clarke, the current (Labour) MSP for West Scotland, is also a member of the House of Lords. However, she took a leave of absence from the House of Lords after being elected as an MSP for the West of Scotland in May 2021.¹³

The next election of the Scottish Parliament is expected in May 2026.

Wales

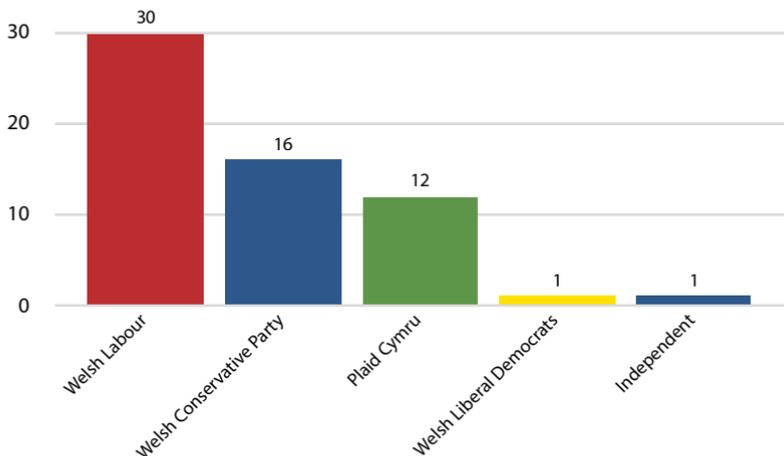
The Senedd normally sits for a five-year term. However, the Senedd can resolve to dissolve itself and hold an 'extraordinary' election.¹⁴

Similarly to Scotland, constituency Members of the Senedd (MS) are elected via a first-past-the-post system. Regional MS are elected via the Additional Members System, using the D'Hondt formula. In Welsh parliamentary elections, 16- and 17-year-olds can vote.

The party with the largest number of MS usually forms the Welsh Government, but coalition governments can also be formed. The Welsh Parliament votes to elect the First Minister.

The current composition of the Senedd (as of October 2024) is as follows:

Members of the Senedd, by political affiliation



Source: *The Welsh Senedd*¹⁵

The Wales Act (2014) bans the holding of dual mandates between the National Assembly for Wales (now the Welsh Parliament) and the House of Commons. The Act provides that an existing MP elected to the Senedd has eight days to resign from the House of Commons, while an existing MS elected as an MP must resign immediately from the Senedd.¹⁶

The next election of the Senedd is expected in May 2026. At this election, several changes to the Senedd will be enacted. These include:

- creating 16 new constituencies;
- increasing the size of the Senedd to 96 members;
- changing to a fully proportional representation system using the D'Hondt formula, with the names of all candidates in a constituency on one ballot paper;
- making it law that all candidates for Senedd elections are resident in Wales;
- increasing the limit on the number of Welsh Ministers that can be appointed from 12 to 17; and
- holding Senedd elections every four years from 2026 onwards.¹⁷

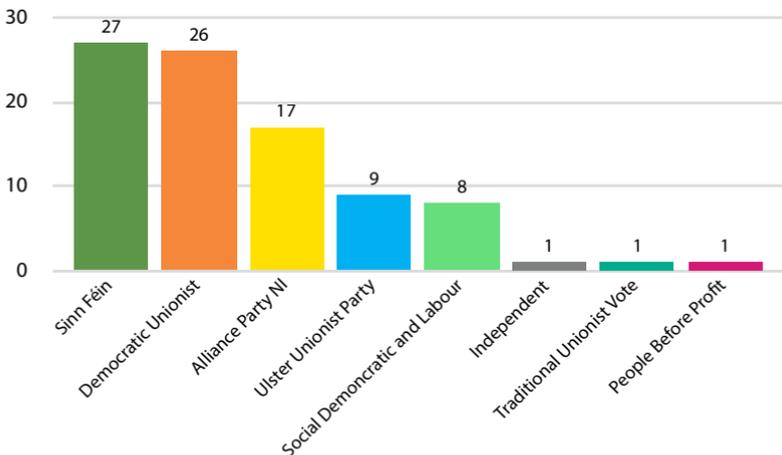
Northern Ireland

The Northern Irish Assembly sits for a five-year term. A vote by two-thirds of the MLAs can dissolve the Assembly and lead to an 'extraordinary' election.¹⁸

The Assembly was created in 1998 following the Belfast (Good Friday) Agreement. It was designed to facilitate power-sharing between Unionists, who support Northern Ireland's continued place in the UK, and Nationalists, who favour a united Ireland, by requiring political parties from the two communities to form a coalition.¹⁹

This works as follows: Elections to the Northern Irish Assembly are conducted under the Single Transferable Vote (STV) proportional representation system. Voters rank candidates in order of preference and can vote for as many or as few candidates as they like. Candidates who meet the 'quota' (the number of votes required, based on the number of seats available and number of votes cast) are elected. Any votes beyond this quota for this candidate are transferred to the 'second preference' candidates on these ballot papers, and so on.²⁰ If all five seats in a constituency are not filled using this method, then the candidate with the fewest votes is eliminated, and their votes transfer to the 'second preference' candidate on their ballot papers. This process continues until all five seats are filled.²¹

Members of the Northern Irish Assembly, by political affiliation



Source: Northern Ireland Assembly²²

Once elected, MLAs must state their 'designation of identity': Nationalist, Unionist or Other. The Northern Ireland Executive must comprise at least two parties representing two different designations (usually Unionist and Nationalist). The First Minister is usually nominated by the largest party within the largest political designation, and the Deputy First Minister is usually nominated by the largest party within the second-largest political designation. The two positions have equal powers; one cannot hold office without the other being in post.²³

The further eight ministers who make up the Executive are nominated by the political parties represented in the Assembly. The number nominated by each is determined using the D'Hondt formula.²⁴

Due to the complexities of the political landscape in Northern Ireland, the intricacies of the power-sharing agreement and the use of 'tactical resignations', the Northern Ireland Assembly has been 'in suspense' several times since 1998.

Interactions with the UK Parliament

The UK Parliament sits at Westminster and has legislative power over UK-wide legislation, reserved powers and legislation applicable to England.

There are 57 constituencies of the UK Parliament within Scotland, 32 in Wales, 18 in Northern Ireland and 543 in England.²⁵ During a UK general election, Members of Parliament (MPs) are elected in a first-past-the-post system to represent their constituency at the UK level and on reserved matters.

These MPs sit in the House of Commons, except for Sinn Féin MPs, who do not take their seats under an action known as abstentionism. By way of explanation, Paul Maskey, the Sinn Féin MP for West Belfast, wrote:

The crucial point here is that we are not British MPs. We are Irish MPs and we believe the interests of the Irish people can only be served by democratic institutions on the island of Ireland. Sinn Féin goes to the electorate seeking a mandate for that position. We are elected as MPs by people who vote for Sinn Féin not to take seats at Westminster.²⁶

There is no separate 'English' Parliament. The UK Parliament in Westminster legislates for England. This means that while Westminster MPs do not vote on devolved matters for Wales, Scotland and Northern Ireland as the devolved parliaments / assembly handle these, Westminster MPs from Scottish, Welsh and Northern Irish constituencies can vote on matters

pertaining to England only. This political issue is known as 'The English Question' or 'The West Lothian Question' as it was raised repeatedly by the Labour MP for West Lothian Tam Dalyell during debates on devolution.²⁷

From October 2015 until July 2021, the House of Commons Standing Orders gave effect to a procedure known as English votes for English laws (EVEL). The Speaker could certify whole government bills, elements of bills and proposals to change bills as relating to England or England and Wales. This could happen at several stages in the legislative process. Briefly, if a bill or part of a bill were certified in this way, various committees of MPs from constituencies in England only would provide scrutiny of bills and, in some cases, consent for the bill to continue.²⁸ The EVEL procedure was ended in 2021, with the then Leader of the House, Jacob Rees-Mogg, stating that EVEL 'added complexity and delay to the legislative process'.²⁹

Within the UK Parliament, there is a Secretary of State for each of the three devolved nations. The roles for each Secretary of State are described differently, to include:

- For Scotland, acting as the custodian of the Scottish devolution settlement, representing Scottish interests within the UK government, and advocating for the UK government's policies in Scotland. They also promote partnership between the UK and Scottish governments and relations between the UK and Scottish Parliaments.³⁰
- For Northern Ireland, they are responsible for the Northern Ireland Office, advancing UK government interests in Northern Ireland and representing Northern Ireland interests in the Cabinet. They also lead on issues including (but not limited to) political stability and relations with the Northern Ireland Executive, national security, counter-terrorism and international interest in Northern Ireland.³¹
- For Wales, the Secretary of State is responsible for the overall strategic direction of the UK government in Wales, including (but not limited to) responsibility for research and development, energy and climate change, transport and sport.³²

Regional devolution

After the devolution of powers to Scotland, Wales and Northern Ireland, thoughts turned to devolution within England. In 2000, the London Assembly and the post of the Mayor of London were created.³³ The London Assembly is comprised of 25 members elected by the additional member system, who hold the Mayor of London to account.³⁴

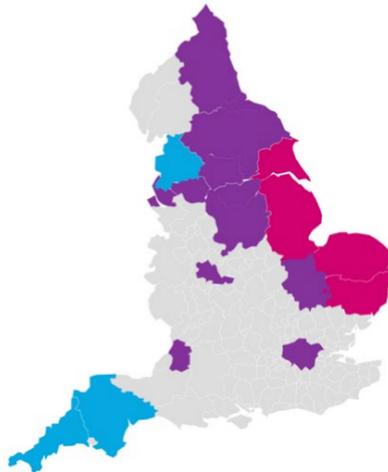
Beginning in 2014, a wider devolution programme began to roll out across England. Devolved powers in England are executive rather than legislative, and the powers and extent of devolution across the regions of England are asymmetrical.

Area type

■ Mayoral deal due in 2025

■ Mayoral devolution in place

■ Non-mayoral deal due in 2025



Source: Institute for Government³⁵

There is a four-level devolution framework in England:

- **Level 1:** this is a limited strategic role in delivering services. No Level 1 deals have concluded.
- **Level 2:** this can be in place with county councils or combined authorities not led by a directly elected mayor. It includes control over adult education budgets, Local Enterprise Partnerships (LEPs) and the UK Shared Prosperity Fund.
- **Level 3:** this requires the adoption of a mayor in a Mayoral Combined Authority (MCA) and allows for more expansive powers, including over transport, regeneration, planning and 30-year investment funds.

- **Level 4:** this can be offered to Level 3 regions that meet governance and capacity criteria. The extra powers cover skills, careers, transport and local energy planning. The first Level 4 deal was concluded with the North East MCA in the spring of 2024.³⁶

In addition, two 'trailblazer' deals were agreed with Greater Manchester and the West Midlands in March 2023. They involve additional powers over transport, skills and housing.³⁷

The future of devolution in the UK

The Labour manifesto for the 2024 General Election committed to establishing a new Council of the Nations and Regions. This Council brings together the Prime Minister, the First Ministers of Scotland and Wales, the First and Deputy First Ministers of Northern Ireland and Mayors of Combined Authorities.

Labour's manifesto also committed to 'devolving power to communities'.³⁸ This is important for the higher education sector, as the devolution framework above provides varying powers in relation to adult education, skills, careers and planning. Ensuring higher education is represented at regional levels of devolution will be key to ensuring the sector's integration in the future of their regions. Metro Mayors can also wield 'soft power'. The Mayor of the Liverpool City Region, Steve Rotherham, launched a Liverpool City Region apprenticeship portal in 2019, years before UCAS began offering an apprenticeship search function.³⁹

The trailblazer deal currently being trailed in the Greater Manchester MCA includes devolved powers over non-apprenticeship adult skills provision.⁴⁰ Proposals in the MCA include offering a defined pathway into higher technical qualifications and taking a 'school-to-employment-to-investment' approach to skills development. Crossover options between the traditional higher education route and the new, defined, higher technical qualification route are built in.⁴¹

School-level education provision is not being included in the trailblazer deal. However, the Mayor of Manchester, Andy Burnham, has launched a 'Manchester Baccalaureate'. This will be similar to the English Baccalaureate (a collection of GCSE passes including English, Mathematics, Science, History, Geography and Languages), but will include Business, Technology

and Engineering GCSEs, feeding into the higher technical qualification pathway.

While regional devolution within England offers new opportunities, including innovation in education and skills, there is a risk that regions with fewer powers and less mature devolution programmes may be left behind. The loss of the Regional Development Agencies in 2011 meant the loss of expertise in regional economic affairs. This started to be rebuilt under the banner of 'levelling up' and the creation by the UK government of 'Investment Zones'. This work will likely continue under the current Government, although it will be badged differently.

Devolved sector statistics

Rose Stephenson

This chapter analyses the differences in the higher education sectors across England, Scotland, Wales and Northern Ireland using data from a number of sources. It will examine themes of:

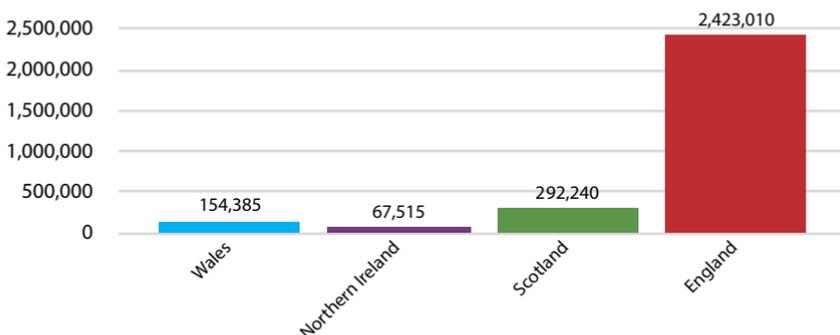
- sector size;
- student populations;
- funding;
- qualifications; and
- widening participation.

One might hope that having four comparative sets of data would make it easy and useful to draw conclusions about the impact of policy decisions. However, given the number of variables behind the statistics below, the detailed analysis needed to achieve this is beyond the scope of this report. Therefore, where links are suggested between policy decisions and outcomes, they are drawn lightly.

Sector size

If we look simply at the number of students enrolled in higher education, the difference in the size of the four sectors becomes apparent. This is shown in Figure 1. England is the largest sector in terms of student enrolment, with 2,423,010 students. Scotland follows with 292,240 students, Wales with 154,385 students and Northern Ireland with 67,515 students.

Figure 1: Total number of higher education students enrolled 2022/23

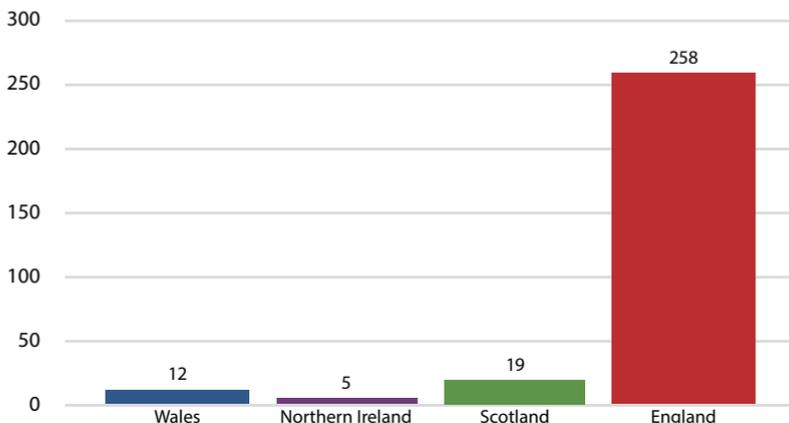


Source: HESA⁴²

When demonstrated this way, it is easier to understand why the media, commentators and policy wonks conflate English higher education with the UK higher education sector and *vice versa*. However, size is not everything, and it is hoped that this paper encourages colleagues to be mindful of their language when discussing the UK, English, Scottish, Welsh or Northern Irish sectors.

We can also consider the number of higher education providers in each sector, as shown in Figure 2. In terms of higher education providers that return data to HESA, England has 258, Scotland has 19, Wales has 12 and Ireland has 5. Over 400 English higher education providers are registered with the Office for Students (OfS) – the primary higher education regulator in England. However, in pursuit of symmetrical information across the four sectors, higher education providers that return data on student statistics are used as the measure here. A number of further education colleges that deliver higher education provision and providers that do not have data to return are not included in HESA figures and explain this difference in the number of providers.

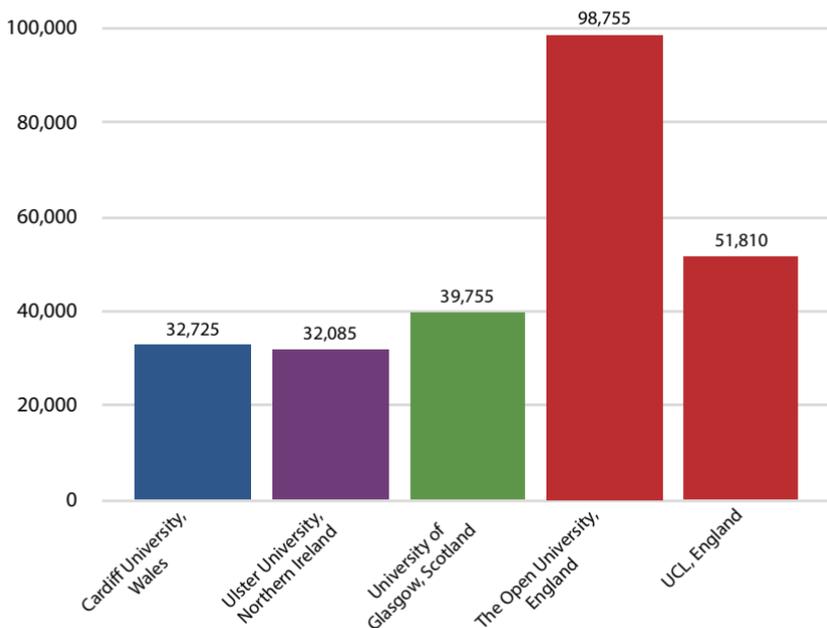
Figure 2: Number of higher education providers (who returned statistics to HESA) 2022/23



Source: HESA⁴³

We can also consider the size of providers across the four sectors. Figure 3 shows the largest providers (by higher education student enrolments in 2022/23). The Open University operates across all four nations of the UK. Figure 3 shows the enrolments at the Open University in England.

Figure 3: Largest provider (all HE student enrolments, 2022/23)



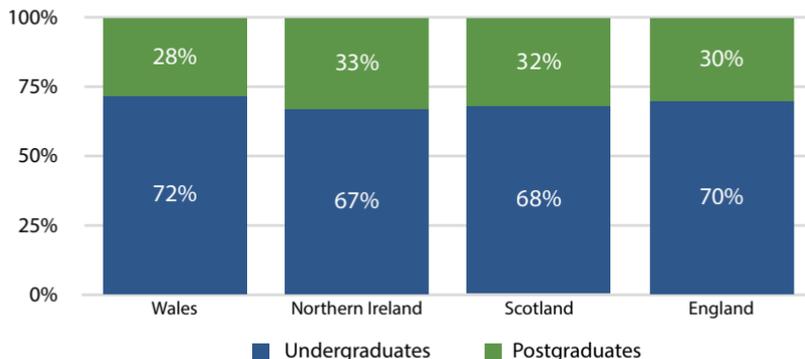
Source: HESA⁴⁴

Understanding the differences in the size of the four sectors is important for understanding policy decisions and why they are not always easily transferable across borders. For example, Wales is looking to move to a more integrated tertiary education system, combining further and higher education. This feels more feasible with 12 higher education providers and 12 further education providers in Wales than it might be in England, with over 250 higher education and 1,973 further education providers.⁴⁵

Student populations

As well as simply considering size, we can also look at the different student populations. Figure 4 demonstrates how the total student population is made up of undergraduates and postgraduates. Northern Ireland and Scotland have the largest proportions of postgraduate students, and Wales has the smallest proportion of postgraduates.

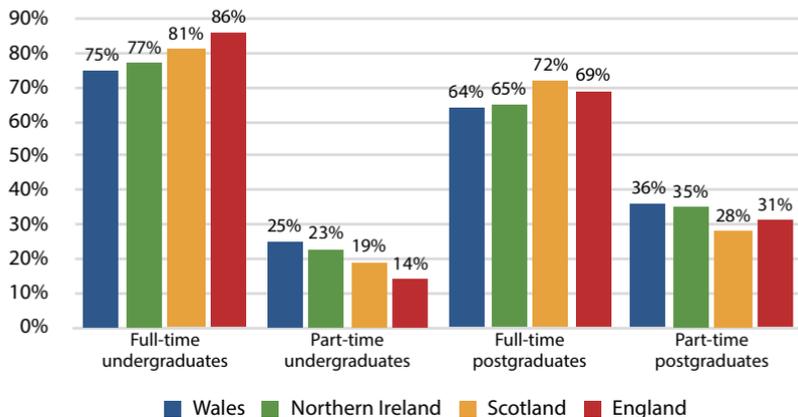
Figure 4: Student populations - undergraduate and postgraduate (2022/23)



Source: HESA⁴⁶

Examining the mode of study shows differences in how students across the four nations choose to study. Figure 5 shows that Wales has the highest proportion of part-time students at both undergraduate and postgraduate levels. England has the lowest proportion of part-time undergraduates.

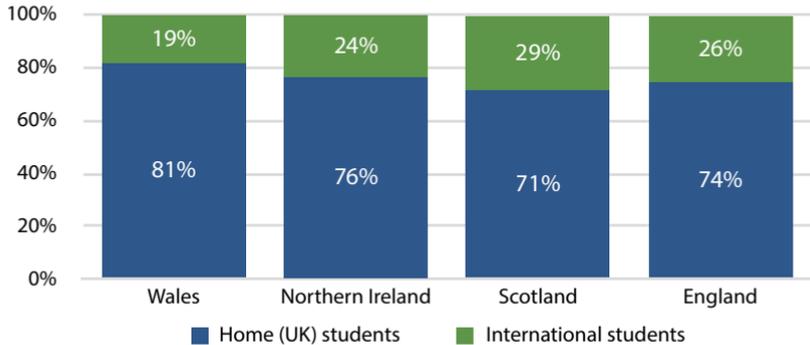
Figure 5: Student populations by mode of study 2022/23



Source: HESA⁴⁷

Figure 6 shows how the home and international student populations vary across the four nations of the UK. Scotland has the highest percentage of international students, at almost 30 per cent, followed by England. The student population in Wales is 19 per cent international.

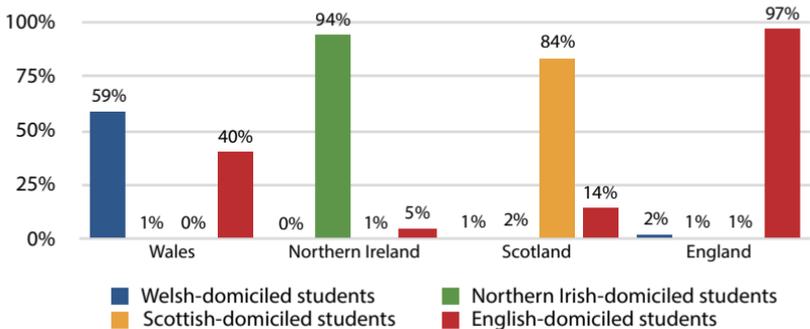
Figure 6: Student populations - UK and International (2022/23)



Source: HESA⁴⁸

Figure 7 shows the student populations by their nation of domicile. This demonstrates the impact of the size of the English student cohort not only in England but also in Wales and, to a lesser extent, Scotland and Northern Ireland.

Figure 7: Student populations by UK domicile (2022/23)



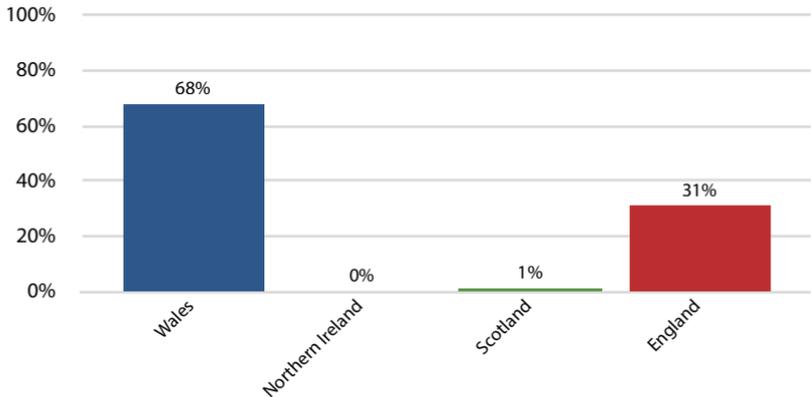
Source: HESA⁴⁹

In addition to considering how the population of students in each UK nation is made up of students from across the UK, we can also look in more detail at cross-border mobility from each home nation.

Figure 8 shows the movement of Welsh-domiciled students across the UK, and Figure 9 shows where Northern Irish students choose to study in the UK. The number is too small to show clearly on the graph; however, 175 Welsh-domiciled students chose to study in Northern Ireland in 2022/23.

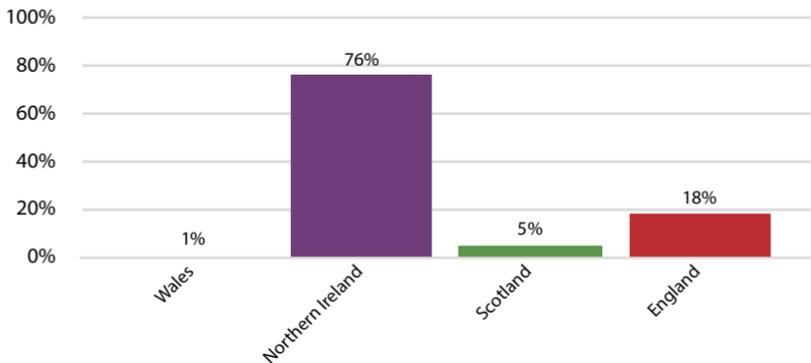
(Figures 8 to 11 do not include the students from those nations who may have chosen to study outside the UK.)

Figure 8: Welsh-domiciled student population flow to UK nations



Source: HESA⁵⁰

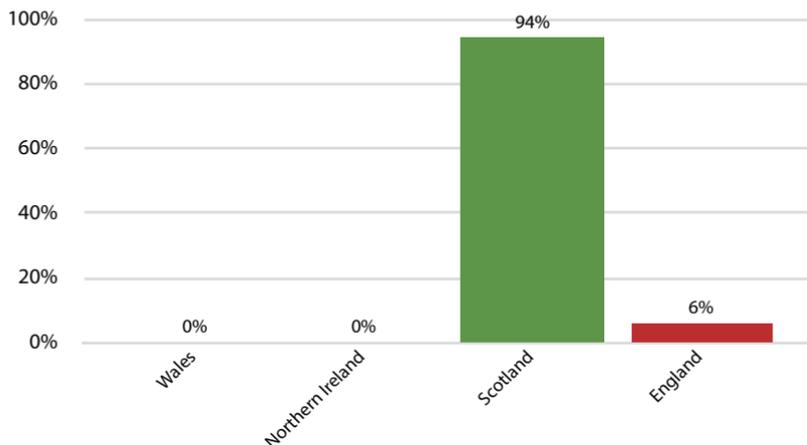
Figure 9: Northern Irish-domiciled student population flow to UK nations



Source: HESA⁵¹

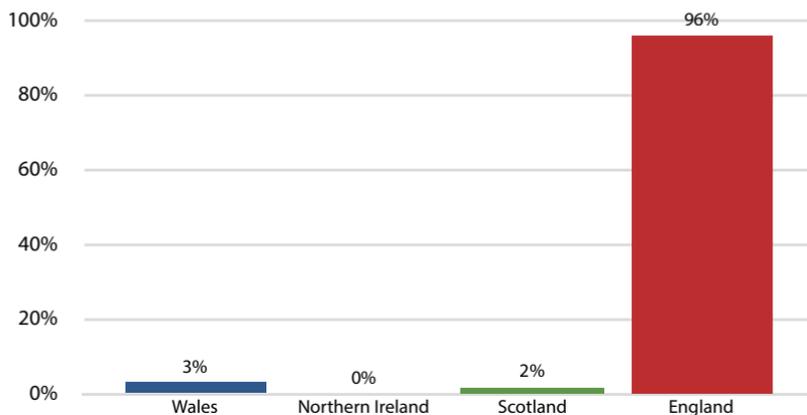
Figure 10 and Figure 11 show the cross-border flows from Scotland and England, respectively. While the percentages are too small to be shown on the graphs, 410 Scottish-domiciled students studied in Wales in 2023, and 235 enrolled in Northern Irish institutions. Furthermore, 2,470 English-domiciled students chose to study in Northern Ireland.

Figure 10: Scottish-domiciled student population flow to UK nations



Source: HESA⁵²

Figure 11: English-domiciled student population flow to UK nations

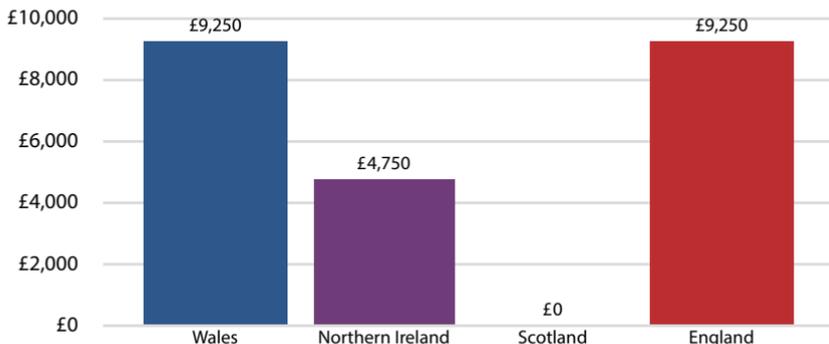


Source: HESA⁵³

Funding

Figure 12 shows how tuition fees differ – for undergraduate students – in 2024/25. The Scottish Government covers the cost of tuition for Scottish-domiciled students. Tuition fees in England will rise to £9,535 from 2025.

Figure 12: Cost of undergraduate tuition fees (to the student) 2024/25



The combination of tuition fees and state investment in higher education, for example through teaching grants for high-cost courses, results in the 'unit of resource' an institution receives per student. Put simply, this is the average amount of money an institution receives per home student. English institutions receive over £10,000 for an average student, with both Scotland and Northern Ireland receiving over £2,000 less per head. This is shown in Figure 13.

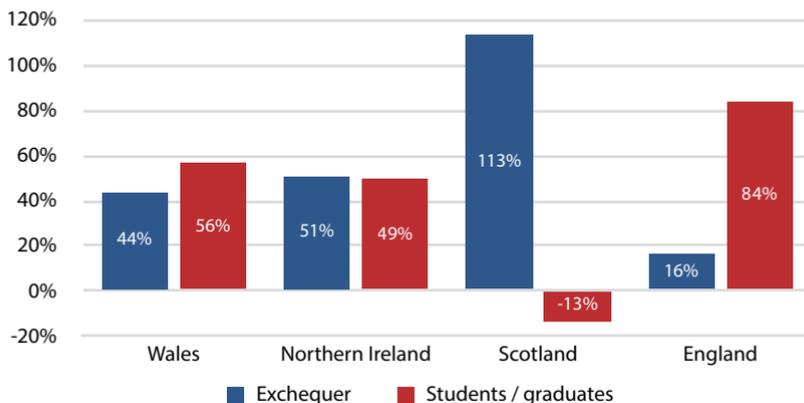
Figure 13: Unit of resource for the institution per home undergraduate (2023/24)



Source: London Economics⁵⁴

One of the biggest disparities we see in these data is how the cost of teaching is shared between the student (or more accurately, the graduate) and the generality of taxpayers via the Exchequer. The Exchequer input here may be through tuition fee grants (as in Scotland), teaching grants for higher-cost courses and the funds needed to cover loan write-offs. Figure 14 demonstrates a relatively even split between these two stakeholders in Wales and Northern Ireland. In Scotland, the state covers the cost of higher education, with the student becoming a net beneficiary of this arrangement. This is because on top of covering the cost of tuition the Scottish Government incurs the additional costs of some maintenance loan write-offs and the cost of maintenance grants. In England, the Exchequer contributes just 16 per cent to the cost of undergraduate higher education. This means that while English institutions receive the biggest unit of resource, this is almost entirely funded by individual students / graduates, with little contribution from the state.

Figure 14: How the cost of undergraduate provision is shared between the graduate and the Exchequer (2023/24)

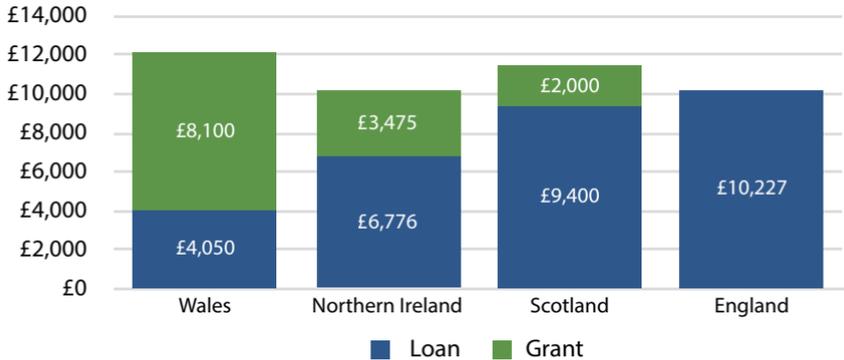


Source: London Economics⁵⁵

Maintenance support for students also differs across the sectors. Figure 15 shows the maximum maintenance support a student can receive, including the maximum grant. Wales has the most generous system, including a large grant for students from the most economically deprived backgrounds. England is an outlier here, with no maintenance grants on offer. This means that students from the most economically deprived backgrounds in

England are likely to leave higher education with a larger debt burden than their peers from wealthier backgrounds.

Figure 15: Maximum available maintenance support, for undergraduate students living away from home, outside of London (2024/25)

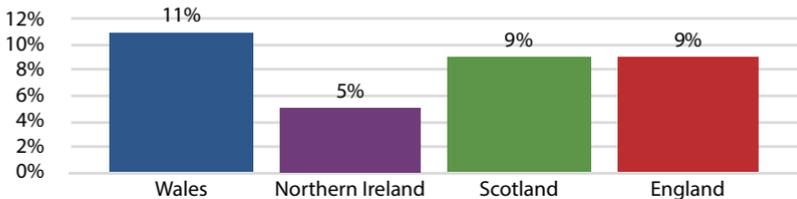


Qualifications

This next section will consider the qualification levels and entry rate into higher education for young people.

Figure 16 outlines the percentage of 16- to 18-year-olds classified as 'Not in Education, Employment, or Training' (NEETS) in 2022/23. This figure is highest in Wales, with 11 per cent of 16- to 18-year-olds in this category. It is 9 per cent in Scotland and England and just 5 per cent in Northern Ireland.

Figure 16: Percentage of 16- to 18-year-olds classified as Not in Education, Employment or Training (NEETS) 2022/23

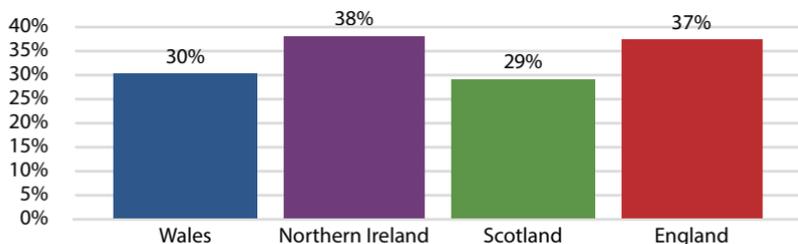


Source: EPP⁶⁶

Figure 17 shows the entry rate of 18-year-olds into higher education (via UCAS). A section of Scottish higher education is not included in UCAS's figures. This is often full-time higher education provided in further education colleges and has historically represented around one-third of

young full-time undergraduate study in Scotland.⁵⁷ Therefore, the data shown in Figure 17 only reflect those applying for full-time undergraduate study through UCAS. This is one example where information is asymmetrical.

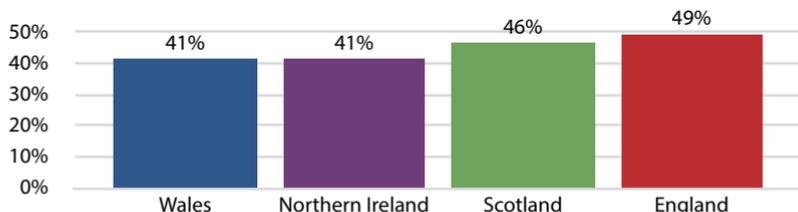
Figure 17: 18-year-old entry rate to higher education (via UCAS)



Source: House of Commons Library⁵⁸

Figure 18 shows the percentage of young adults (aged 22 to 30) holding Level 6 qualifications or above. This is 49 per cent in England, 46 per cent in Scotland and 41 per cent in both Wales and Northern Ireland. Wales and Northern Ireland have both seen an increase in the share of young adults with Level 6 qualifications over the last decade, although there has been a decrease in Northern Ireland since the pandemic in 2020.⁵⁹

Figure 18: Percentage of young adults holding Level 6 qualifications or above (2022)



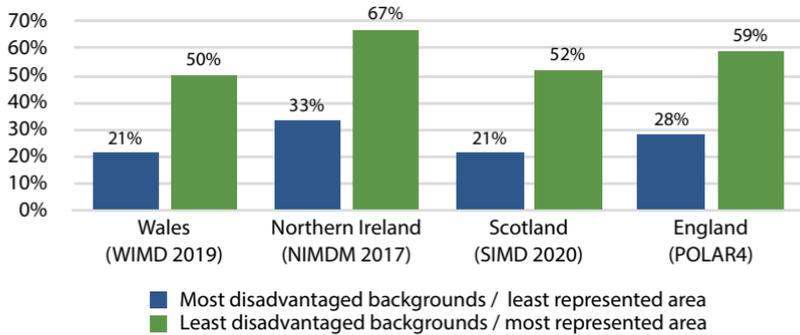
Source: EPI⁶⁰

Widening participation

Figure 19 shows the application rates to higher education from the most and least disadvantaged quintiles of the population. The bars for England, however, show the application rates from the areas of lowest and highest university participation. Again, divergence in data collection means these figures are collected and assigned using different categorisation systems. Further, college-based higher education provision in Scotland is not

captured by UCAS, therefore, a cohort of applicants skewed towards the lower quintiles are not included in these figures. As such, comparisons should be made with caution.

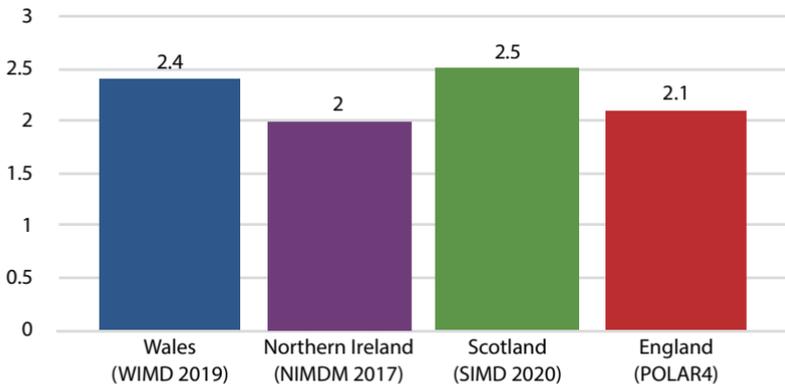
Figure 19: Application rates for those from the most and least disadvantaged background / represented areas



Source: UCAS⁶¹

We can also consider the ‘application rate gap’. This demonstrates the number of times more likely a student from the least disadvantaged backgrounds are to apply to higher education, compared to those from the most disadvantaged backgrounds. To put this another way, the ‘gap’ shows how many of the most advantaged applicants there will be for each of the most disadvantaged. This is shown in Figure 20.

Figure 20: The ‘application rate gap’



Source: UCAS⁶²

How Welsh higher education policy has diverged from the rest of the United Kingdom

Dewi Knight and Dr Sarah Morse

Introduction

Prior to the establishment of the National Assembly (as the devolved Welsh Parliament was known at its inception in 1999), the development of distinctly Welsh education institutions and priorities was possibly the most robust reflection and representation of Welsh national identity and ambition.⁶³

The creation of colleges at Aberystwyth, Bangor and Cardiff, as well as the University of Wales, were products of a late nineteenth-century class, cultural, national and industrial mission. The Founding Charter of the University of Wales (1893) constituted a university 'in and for Wales, for both men and women to be eligible equally, for north, mid and south Wales; and for the advancement of the nation.'⁶⁴

The wider educational landscape in Wales

Before full primary law-making powers were devolved to Wales in 2011, schools policy was one of the 'clearest' red waters between Wales and England during the devolution era. ('Clear Red Water' was a Rhodri Morgan phrase outlining the different approaches between Welsh Labour and the New Labour Government in Westminster).⁶⁵

The Welsh system remains (largely) one of comprehensive, non-selective, local authority-funded and managed schools. Around a quarter of schools are Welsh-medium or bilingual, where Welsh is the primary language for teaching and learning.

Only 2 per cent of pupils in Wales attend independent schools, a much smaller group than the 4+ per cent in Scotland and 6+ per cent in England.⁶⁶ There is a national inspectorate for education (Estyn), a national qualifications body (Qualifications Wales) and an examination board (WJEC). However, most teaching and workforce unions are organised on an England and Wales basis.

The higher education sector in Wales

At the end of the twentieth century and the start of the new era of democratic self-government, Wales had 13 universities, and all but the University of Glamorgan (now part of the University of South Wales) were members of, or affiliated to, the University of Wales.

In the last 25 years of democratic self-government, the shape and size of the Welsh higher education sector, especially that of the national university, has altered remarkably. Institutions have merged, been renamed and ceased to exist. The nature of student fees and funding has changed regularly, often as a reaction to developments in England but with different choices made on how, when and who to support financially.

The choices made by successive Welsh Governments and the Higher Education Funding Council for Wales (HEFCW) have sought to promote collaboration rather than competition, ultimately leading to the establishment in 2023 of the national Commission for Tertiary Education and Research now known by the name 'Medr' which is Welsh for 'skill' or 'ability'. This will attempt to manage all post-16 education as one system.⁶⁷

Successive Welsh Governments have also nurtured new national educational bodies that seek to advance national priorities.

In 2010, the Learned Society of Wales, the first national scholarly academy for Wales, was established.⁶⁸ Launched with 60 Founding Fellows and a process 10 years in the making, it gives Wales a national academy like those in London, Edinburgh and the island of Ireland.

As part of the One Wales Coalition between Welsh Labour and Plaid Cymru, in 2011 the Welsh Government established the Coleg Cymraeg Cenedlaethol to 'maintain, develop and oversee Welsh medium higher education provision'.⁶⁹

In 2017, as part of the 'progressive agreement' between Labour and Liberal Democrats, Kirsty Williams became the Minister for Education in the Welsh Government. Under this agreement, the remit of the Coleg was extended to include Welsh and bilingual provision in further education colleges, apprenticeships and work-based learning.⁷⁰ The Coleg has funded postgraduate scholarships and the development of Welsh-medium

resources to support higher education teaching and research across a range of subject areas. In the first 10 years of the Coleg, the number of higher education staff able to teach in Welsh increased by 35 per cent and, in 2021/22, 5 per cent of students were studying at least five credits through Welsh-medium higher education, up from 2 per cent in 1999/00.⁷¹

The UK's departure from the EU dramatically changed the research funding landscape of Wales. Between 2014 and 2020, EU structural and investment funds provided Welsh universities with £350 million of funding for research, innovation and training activities. Partly to address this loss, Welsh universities have now come together through the Wales Innovation Network to identify strategic partnerships and be more competitive in securing UK-wide research funding.

Higher education funding in Wales

Over the last 25 years, as in England, funding to Welsh universities has come more from student fees and less from HEFCW grants.

Successive Welsh Governments have sought 'made in Wales' solutions within this context, particularly on student financial support. In 2002, limited and targeted means-tested student grants (worth up to £1,500 and portable across the UK) were reintroduced.⁷² This provided a sharp contrast between Labour administrations in Cardiff and London.

When top-up fees (£3,000) were introduced in Wales (following England), the cost to students was subsidised through a Fee Grant so that the cost remained equivalent to the pre 'top-up' fee of £1,175.⁷³ Again, this saw Labour ministers in Cardiff seeking to mitigate the effects of Labour Westminster policy.

When £9,000 fees were introduced in England in 2012/13 and when student number controls were removed a few years later, these policies were designed for England. But the cross-border flow of students and 'competitive' positioning of Welsh universities saw ministers in Wales decide to implement the same headline policies.

Following the move to £9,000 fees, Leighton Andrews, former Minister for Children, Education & Lifelong Learning, introduced a much larger Tuition Fee Grant 'to cover the additional costs of fees wherever in the UK they choose to study' (in effect, increasing the fee grant to £5,500+ for full-time

undergraduates).⁷⁴ This was even sharper political and policy differentiation between a Welsh Labour / Plaid Cymru coalition and the Conservative / Liberal Democrat Coalition at Westminster. The fee grant was not means-tested, was portable across the UK and did not support upfront costs; a limited student support grant remained available, but maintenance support was mostly covered by a loan. Some part-time students were now also able to access a tuition fee loan.

The Diamond Review of Higher Education Funding in Wales (2016) led to a different approach and emphasis on student support.⁷⁵ Kirsty Williams abolished the tuition fee grant policy and shifted funding towards maintenance support. Seeking to deliver for 'all' students and the 'whole system', she introduced means-tested maintenance grants and loans available to all full- and part-time undergraduates and an equivalent system for postgraduates.⁷⁶

Full-time undergraduates from Wales – wherever they are studying in the UK – can receive a maximum maintenance grant of £8,100 (£3,000 for part-time) and a loan of £4,050. All full-time undergraduates are eligible for a minimum 'base grant' of £1,000 (£500 for part-time) and the loan element increases to £11,150 for household incomes of more than £59,200.⁷⁷ This is the most generous maintenance package in the UK.

From 2024/25, however, the Welsh Government has decided postgraduate support should be in the forms of loans only.⁷⁸

Cross-border flows

Student mobility is a distinctive characteristic of higher education in Wales. Welsh students have long been drawn to the larger English sector (Jesus College, Oxford was established and then evolved in the sixteenth century as a de-facto Welsh college) and, each year, just under a third of Wales-domiciled undergraduates enrol on courses at providers in England.⁷⁹ In England, only 4 per cent of home-domiciled students are enrolled at providers elsewhere in the UK and, in Scotland, 6 per cent cross the border.⁸⁰

Within the Welsh sector, 54 per cent of all undergraduates enrolled at Welsh providers were domiciled in Wales in 2021/22; 36 per cent of enrolled undergraduates were from England. This has been a consistent trend over the last 25 years, and Wales is a net importer of students.

These flows are unsurprising considering the relatively porous economic, educational and cultural borders between Wales and England.

Political and policy divergence

Leighton Andrews's 2010 warning that universities needed to 'adapt or die' shocked the sector.⁸¹ The Higher Education Funding Council for Wales (HEFCW) followed by recommending fewer but larger universities within a regionalised approach.⁸²

This created the conditions for university mergers, alongside the controversies of the University of Wales' international operations.⁸³ Institutions were already withdrawing from University of Wales degrees and issuing their own, and the University of Wales effectively ceased to exist, merging with Trinity Saint David and Swansea Metropolitan to create a new university (which also includes constituent further education colleges).

In 2016, Kirsty Williams challenged universities to 'recapture and reinvent a civic mission'.⁸⁴ This was a response to the Brexit referendum and a worry that the higher education sector was disengaged from its historical purpose and from Welsh policy challenges. Williams sought to challenge the sector and set a new policy direction. Moving away from a focus on changing the number and shape of individual institutions towards viewing universities (and government) as 'stewards of communities', particularly on matters of social cohesion, active citizenship and informed debate and disagreements.⁸⁵

This agenda saw the sector become a real living wage employer, increase relationships with schools and greater community engagement. A Civic Mission Framework – the first such in the UK – was agreed by all universities during the pandemic and continues to guide the sector's 'people and place' contributions.⁸⁶

However, more comprehensive strategic reconfiguration had not gone away. Initiated by Williams, and with legislation taken through the Senedd by her Labour successor Jeremy Miles (with a greater emphasis on social partnership and lifelong learning), the new Commission for Tertiary Education and Research (Medr) became operational in August 2024.⁸⁷

Medr is the arm's-length body that funds, plans and regulates post-16 education and research. This includes further and higher education,

work-based learning, school sixth forms and government-funded research and innovation. It takes on all the functions of the now-dissolved Higher Education Funding Council for Wales (HEFCW), plus many Welsh Government functions. Medr has been established to take a 'whole system approach', promote learner interests and pathways and improve performance monitoring and governance.

Miles issued the first statement of strategic priorities in early 2024 (when he was still Education Minister), which reiterated those priorities but also emphasised the need for:

[a] strategic direction of the system ... reducing duplication by encouraging providers to differentiate themselves ... play(ing) to individual strengths ... include exploring outcome-based funding based on collaborative approaches.⁸⁸

This suggests that we might see future Medr funding and strategies which promote 'differentiation' across higher and further education, with institutions concentrating more on their separate identities and goals.

A policy to borrow and a policy to keep

To conclude this section of the report, we have been challenged to choose a policy to 'borrow' from elsewhere and a policy to 'keep'.

To start with, the one for keeps – it would be the approach, unique in Europe when introduced, of maintenance grants (and loans) across modes and levels of study. This policy has significantly increased postgraduate numbers (one reason that the Government may have felt comfortable recently changing the policy) and supported a new approach for part-time students.

A policy to borrow? To move forward with a real 'differentiation' strategy for Wales. It would be nice to have a genuine postgraduate-only advanced research institution aligned to national economic and innovation priorities. Drawing inspiration from Cranfield University, the suggestion for a 'Future Generations Lab', or a completely new model co-developed and owned by the sector, government and industry.⁸⁹

How Northern Irish higher education policy has diverged from the rest of the United Kingdom

Meadhbh Keating Fitzpatrick

Introduction

Northern Ireland has a long history of devolution – much longer than the 25 years broadly discussed in this paper. It was in 1921 that the Northern Ireland Parliament was established by the Government of Ireland Act.

This earlier Parliament in Northern Ireland was modelled on Westminster and, in practice, copied much of its legislation.⁹⁰ This included the passing of the Education (Northern Ireland) Act 1947, following the similar Education Act 1944 in Westminster.

This Act introduced free secondary education and academic selection to Northern Ireland in the form of the ‘eleven-plus test’. As more people accessed secondary education, more people started to access higher education. At the time, Queen’s University Belfast was the only university in Northern Ireland, first established in 1845 as Queen’s College Belfast before becoming an independent university in 1908.⁹¹ However, the impact of the 1947 Act was a surge in higher education students and the creation of a new university, the precursor to today’s Ulster University.⁹²

This Parliament was to last for just over 50 years before it was suspended during the early years of the Troubles (the conflict in Northern Ireland that started in the late 1960s, lasted for nearly 30 years and led to over 3,500 deaths).

The wider educational landscape in Northern Ireland

The difficulties of passing politically unpopular policies in Northern Ireland are important to be aware of, as they inform how primary and secondary education in Northern Ireland is structured and how, in turn, this informs the pathways students have in order to access higher education.

Academic selection and the role of grammar schools are just as much part of the Northern Irish education system in 2024 as in the years after they were first introduced. One of the problems in replacing the eleven-plus in Northern Ireland was agreeing on a system to replace it. While most parents

wanted to see the abolition of the eleven-plus, most parents also wanted to retain academic selection of some kind.⁹³ To date, this contradiction has been impossible to reconcile. In 2002, the newly established Northern Ireland Assembly was about to be suspended (one of many collapses that would follow over the next 22 years). The Education Minister at the time, Sinn Féin's Martin McGuinness, unilaterally announced the abolition of the eleven-plus.

The UK government, which oversaw the governance of Northern Ireland in the following years, continued to work towards this policy. When the Assembly returned in 2007, just as the eleven-plus was about to be scrapped, the parties in government could not agree on an alternative system. In the vacuum that emerged, grammar schools introduced their own tests. However, instead of one test to replace the eleven-plus, two tests emerged. One test is for controlled grammar schools – or 'Protestant' grammar schools – and another for other grammar schools, the majority of which are Catholic maintained, and so are the 'Catholic' grammar schools.⁹⁴

This religious divide in Northern Irish education was nothing new, but in creating a new unregulated academic selection system, this division was reinforced. Instead of putting their children through one test (with two exams), parents now had to choose between putting children into two tests (up to five exams) or limiting choice by picking one exam board. Most parents chose the latter.⁹⁵ With the majority of children attending schools split on religious lines, higher education in Northern Ireland – for many students – is the first opportunity to access integrated education.

Another reason this is relevant to higher education is the socio-economic divide between grammar school pupils and secondary school (the colloquial term for non-grammar schools in Northern Ireland) pupils. Using Free School Meals entitlement as a proxy, disadvantaged students are strongly represented at secondary schools. For example, for Year 8 pupils in 2019/20:

- 78.1 per cent of pupils in secondary schools were entitled to Free School Meals; and
- only 21.9 per cent of pupils in grammar schools were entitled to Free School Meals.⁹⁶

Furthermore, for 2018/19 it was recorded that:

- 21.2 per cent of pupils from secondary schools went on to higher education; and
- 68.4 per cent of pupils from grammar schools went on to higher education.⁹⁷

These two comparisons suggest a link between the financial background of students, which school they go to and ultimately whether they go on to higher education.

This further highlights the importance of the widening participation work of universities in Northern Ireland and the need to review the funding system for higher education.

The higher education sector in Northern Ireland

Northern Ireland has three universities, with Queen's University Belfast being the oldest in Northern Ireland. Queen's has been a constant and stable presence for almost 180 years and has made a major contribution to the development of the city of Belfast and to Northern Ireland and its people. Ulster University is the younger and larger university. Its campuses stretch across Northern Ireland with campuses in Belfast, Coleraine and Derry / Londonderry. The Open University reaches across the UK and beyond. Since it was set up in 1969, records show that over 57,000 people in Northern Ireland have studied with the University.

There are also two university colleges – St Mary's University College and Stranmillis University College. These colleges primarily focus on training teachers; both are academically recognised as university colleges of Queen's University Belfast.

Across Northern Ireland, there are also six regional further education colleges. Higher education courses are also offered and delivered in these colleges. There is also the College of Agriculture, Food and Rural Enterprise, known as CAFRE, that provides education in agri-food and rural businesses and is part of Northern Ireland's Department of Agriculture, Environment and Rural Affairs.

Higher education funding in Northern Ireland

Unlike other parts of the UK, Northern Ireland does not have a higher education funding council. Instead, the Department for the Economy (DfE) undertakes that role.

As the level of tuition fees was being assessed in Westminster following the 2010 General Election, the Northern Ireland Executive was doing the same thing. It was decided that tuition fees, at the time £3,465 for students in Northern Ireland, would only rise in line with inflation. For the 2024/25 academic year, this is £4,750. As students receive support from the nation in which they reside, students studying in Northern Ireland who are domiciled in Northern Ireland receive student loans of £4,750 for fees of the same cost.⁹⁸ Students from England, Scotland and Wales are subject to the higher home fee of £9,250.

There are student number controls in Northern Ireland. The Maximum Aggregate Student Number cap, or the MASN cap as it is commonly referred to, limits the number of student places in universities in Northern Ireland. Northern Ireland's Department for the Economy sets the cap to control the number of students studying for financial reasons. The MASN cap is the control mechanism to ensure spending from the Department to universities stays within its budget allocation. Former Minister for the Economy, Gordon Lyons MLA, said in 2022 that removing the MASN cap would require one of two things to cover the additional cost of higher education in Northern Ireland – a rise in tuition fees or a reduction in funding to other public services.⁹⁹

Research funding has also suffered in Northern Ireland. For example, regional funding allocations for quality-related research (QR) funding and higher education innovation funding have remained flat since 2017/18, whereas they have increased in England, Scotland and Wales.

Cross-border flows

While it would have been hoped that lower fees compared to the rest of the UK would have incentivised students to stay in Northern Ireland for their studies, this system has come with severe funding pressures and resultant consequences. Universities across the United Kingdom are suffering from these pressures, but the situation is acute in Northern Ireland. Funding

has not kept pace with the other nations and the disparity in higher education has grown. An impact of this has been a reduction in student places – limited funding from the Executive means that student numbers are capped. This means a large proportion of Northern Irish-domiciled students travel to other locations in the United Kingdom to study and two-thirds of these emigrant students do not return home to Northern Ireland after their studies.¹⁰⁰

This equates to over 5,000 students leaving every year to go to university in England, Wales or Scotland who otherwise might have stayed. With businesses looking for more local graduates, it impacts their decisions on investment and growth, which reduces the range and number of jobs available in Northern Ireland. Northern Ireland's loss is England, Wales and Scotland's gain. The role of academic selection in setting the path for who goes on to university highlights why it is even more critical that universities be empowered to expand their widening participation work.¹⁰¹

Political and policy divergence

After the Good Friday Agreement had been agreed upon in 1998 and the new Northern Ireland Assembly was established in 1999, this was to be a new beginning for local self-governance. While these were seminal moments in Northern Ireland's history, and an end to the violence of the Troubles, they were not the end of political instability. The Northern Ireland Assembly has been characterised by repeated periods of abeyance since it was first established.

A consequence of the collapses of the Assembly and Executive is instability in the Budget for Northern Ireland. The Secretary of State for Northern Ireland has had to set annual budgets numerous times since 2017. These one-year budgets allow public services to be delivered when the Executive is not operational, but they are limited. Without an Executive, long-term and even medium-term planning does not happen.

This has severe consequences for public services, particularly those at moments of transition, those requiring transformation and those needing new funding approaches.¹⁰² For example, the deeply unpopular MASN cap limits opportunities to widen participation in higher education and creates a 'brain drain' of Northern Irish talent leaving to study in other parts of the UK.

There has been serious discussion for the last few years on funding pressures facing all public services in Northern Ireland. This, combined with the lack of government while the Executive collapsed from 2022 to 2024 and the difficulty of the funding question itself, both politically and as a policy question, has meant a new funding system for higher education is still up in the air.

A policy to borrow and a policy to keep

One policy that could easily be changed is the MASN cap. While there are no perfect alternatives to borrow, having a sustainable funding model for higher education in Northern Ireland is vital for the future of higher education. With universities playing such an important role in Northern Ireland's economic, social and cultural future, by extension a sustainable funding model is vital for Northern Ireland's future plans. If there were a perfect model, this would be the 'borrow' but, instead, policymakers could explore and adapt a range of possibilities for the Northern Irish context. Some of these options were explored in the recent Nuffield Foundation / London Economics report that analysed the fees and funding arrangements across the four parts of the United Kingdom.¹⁰³

While perhaps not a traditional policy, one of the things to 'keep' about the Northern Irish higher education system is its mix of local and global. Universities in Northern Ireland are critical to their local areas and the region. They play a pivotal role and act as key partners in driving social change and delivering economic development. Universities in Northern Ireland punch above their weight, drawing in political leaders, world-leading research and foreign direct investment. They are key delivery partners for the governments' priorities – both the Northern Ireland Executive and the UK Government. For example, Queen's University Belfast is a UK leader in cyber and AI, with the new Cyber-AI Hub at the Centre for Secure Information Technologies (CSIT) based at Queen's.

Another special element of higher education in Northern Ireland is the experience of the students. A HEPI report from 2020 showed that students in Northern Ireland were found to have more positive wellbeing than their counterparts in the rest of the UK.¹⁰⁴ Northern Ireland also has the lowest student living costs in the UK according to the Save the Student *National Student Money Survey 2023*.¹⁰⁵

How Scottish higher education policy has diverged from the rest of the United Kingdom

Professor James A Miller FRSE

Introduction

Scotland has a long tradition of valuing education. It was the first nation to introduce compulsory primary education with the Education Act (1696) and its universities are among the oldest in the English-speaking world, with the University of St Andrews founded in 1413.¹⁰⁶ This rich history has fostered a deep-seated cultural appreciation for higher education and intellectual pursuit in Scotland.

While the rest of the UK was heavily influenced by the English lead, Scotland maintained its own structures and policies. This was cemented by the 1707 Acts of Union, which preserved Scotland's legal and educational systems. As a result, Scotland developed a tradition of broad-based education, with a curriculum that often includes a wider range of subjects compared to the more specialised system in the rest of the UK.

The wider education landscape in Scotland

The Scottish pre-university qualification system is characterised by its flexibility, breadth of subject offerings, and a focus on both academic and vocational pathways. It differs significantly from the systems in the other UK nations, reflecting Scotland's distinct educational philosophy and structure.

Curriculum for Excellence

The national curriculum framework for Scottish education, covering ages 3 to 18, aims to provide a broad and balanced education, fostering skills and knowledge across a wide range of subjects. It is divided into different levels:

- **Early Level** (ages 4 to 6);
- **First Level** (ages 6 to 9);
- **Second Level** (ages 9 to 12);
- **Third and Fourth Levels** (ages 12 to 15); and
- **Senior Phase** (ages 15 to 18).

National Qualifications

During the Senior Phase, students undertake National Qualifications (NQ), which are the main set of qualifications offered in secondary schools. NQ are assessed through a combination of coursework, practical assessments and final examinations. These qualifications are managed by the Scottish Qualifications Authority and include several levels:

- **National 1-5:** These qualifications are typically taken by students aged 14 to 16, with National 5 being the highest level at this stage. They are designed to assess knowledge and skills in specific subjects.
- **Higher:** Taken in the fifth year of secondary education (S5), usually by students aged 16 to 17. Highers are crucial for university admission and are considered a key qualification in the Scottish education system.
- **Advanced Higher:** These are taken in the final year of secondary education (S6) by students aged 17 to 18. Advanced Highers provide further specialisation and are comparable to the first year of university study.

Alternative qualifications and pathways

In addition to traditional academic subjects, Scotland's pre-university system includes vocational qualifications and awards that cater to diverse student needs and interests. These include Skills for Work Courses, Scottish Baccalaureate and Foundation Apprenticeships.

Articulation and transition to higher education

Scotland's qualification system supports a range of pathways into higher education. Highers are the most common route for university admission, with Advanced Highers providing an opportunity for deeper subject knowledge. Compared to England and Wales, Scotland has a higher proportion of students studying higher education at colleges, who then can articulate with higher national certificates or diplomas from college into university with 'advanced standing', that is, into the second or third year of a degree.¹⁰⁷

The higher education sector in Scotland

Devolution has, perhaps inevitably, led to further significant differences in

the way higher education is funded, structured and delivered in Scotland compared to the rest of the UK. Reserved matters at Westminster, such as immigration, do however have a significant impact on how the sector in Scotland develops.

A key feature of the Scottish higher education system has been its relative stability. With 19 established public institutions, when Scotland's Rural College received its degree-awarding powers in October 2024, it was the first change in 13 years. This is in sharp contrast to the rapid increase in the number of registered higher education providers, specifically private, in England post-2010.¹⁰⁸

The number of institutions in Scotland and their proximity to one another allows for greater partnership working and policy coordination as a sector, an example of which is explored later. This is a feature shared with both Northern Ireland and Wales, which enables all institutions to meet collectively with funding bodies and Ministers, something less likely in England. A recent provocation to vice-chancellors was that this may be as much of a disadvantage as an advantage.

Curriculum and degree structure

The curriculum structure also differs from the rest of the UK, with Scottish undergraduate honours degrees typically lasting four years, compared to three years elsewhere. This additional year is designed to offer a broader and more flexible education, allowing students to explore a wider range of subjects before specialising. This is consistent with the traditional Scottish emphasis on a broad education, akin to the liberal arts model found in the United States.

The first year of Scottish undergraduate education often includes a range of subjects, even for students who have declared a primary subject. This breadth of study encourages a broader intellectual foundation and allows for interdisciplinary learning.

Research and innovation

Scotland is a leader in research and innovation, with its universities playing a crucial role in advancing knowledge and technology. Research from Scotland receives 80 per cent more citations in peer-reviewed research than the global average.¹⁰⁹

Research in Scotland is supported and funded by UK-wide and Scotland-specific funding bodies. UK Research and Innovation (UKRI) provides substantial funding across the UK, including in Scotland. Additionally, the Scottish government and the Scottish Funding Council (SFC) support research through various initiatives and grants, similar to funds deployed by Research England though with different criteria and terminology (for example, QR funding in England is known as REG – Research Excellence Grant – in Scotland). Scotland’s strategic focus on research and innovation aligns with its economic development goals, particularly in sectors like life sciences, renewable energy and digital technologies.

The research landscape in Scotland benefits from a high level of collaboration between universities, industry and government. Initiatives like the Innovation Centres, supported by the SFC, facilitate partnerships between academia and industry to drive economic growth and address societal challenges. This collaborative approach is a hallmark of Scotland’s higher education system and contrasts with the more competitive approach often seen in other parts of the UK.

Higher education funding in Scotland

One of the most notable differences between higher education in Scotland and the rest of the UK is the funding model, particularly regarding undergraduate tuition fees. The removal of tuition fees in 2000 for Scottish students was one of the first acts of the Scottish Parliament in its first term, the policy reversing the decision to introduce tuition fees made by the Labour Government in Westminster in 1997.

The policy reflects a broad commitment to education as a public good and an effort to reduce financial barriers to higher education but is not a universal policy and impacts cohorts differently.

In Scotland, tuition fees for Scottish undergraduate students are funded through the Student Awards Agency for Scotland (SAAS) and are set at £1,820 per year. Universities also receive a block grant from the SFC to supplement this basic tuition fee which takes the average funding per student in Scotland to £7,870. The source of all these funds is the public purse. Audit Scotland recognised in 2019 that funding for Scottish undergraduate students only reached 92.4 per cent of the cost of delivery.¹¹⁰

The undergraduate tuition fee policy means the Scottish government places a number control ('cap') on the total undergraduate Scottish population, which has meant that demand for places at Scottish universities has outstripped the ability of institutions to supply them in recent times.¹¹¹

While most undergraduate Scottish students do not pay tuition fees, crucially, this is not universal. Students studying part-time, for example, will pay tuition fees and over the same period there has been a significant decline in numbers at Scottish institutions.¹¹²

At undergraduate level, non-Scottish students (those from the rest of the UK, the EU and international students) pay tuition fees, set by each institution. At postgraduate level, tuition fees are in place for all students including those from Scotland.

Cross-border flows

Scotland is a net importer of students from the rest of the UK. In 2022/23, approximately 11,000 Scottish-domiciled students left Scotland to study in other parts of the UK (mostly in England). Over 33,000 non-Scottish UK students enrolled in Scottish institutions in the same year. While the majority of these students were English-domiciled (around 29,000), this only represents 1.6 per cent of the English-domiciled student population. Northern Irish students made up 3,250 of the incoming students, but this represents over 6 per cent of the Northern Irish-domiciled student population.

Scotland's universities have a strong international presence, attracting students and staff from around the world, usually at a higher proportion than the UK average.¹¹³ Scottish institutions are also leaders in transnational education. The Scottish government and universities actively promote Scotland as a destination for international students, emphasising high-quality education, cultural experiences and a welcoming environment with high-profile campaigns and public policy.¹¹⁴

While Scotland shares the UK's general approach to international students, including the same visa regulations, there is a distinct emphasis on making Scotland an attractive destination. This is supported by various scholarships and funding opportunities aimed at international students, as well as policies that encourage international research collaborations.

The importance of international students is recognised by the Scottish Government through its cross-cutting international promotional campaign, Scotland Is Now, with one of its four pillars (study) sitting alongside tourism, work and investment.

Brexit has posed challenges for Scotland's internationalisation efforts, particularly in relation to EU students and research funding. EU student numbers declined by 39 per cent between 2018/19 and 2022/23, largely because EU students now pay international tuition fees and have no access to loans from the Student Loans Company to pay their fees. Pre-Brexit they were treated as equivalent to home students in Scotland for fees and funding purposes. However, Scotland has sought to mitigate these impacts through initiatives like the Saltire Scholarships, aimed at non-EU international students, and continued participation in global research networks.¹¹⁵ The UK's re-entry into the Horizon programme will take some time to bear fruit.

Political and policy divergence

Widening access and participation

Scotland has a strong focus on widening access to higher education, particularly for students from disadvantaged backgrounds, as defined by the Scottish Index of Multiple Deprivation (SIMD). The Scottish Government has set ambitious targets to increase the proportion of students from the most deprived areas attending university (by 2030, 20 per cent of Scottish full-time undergraduate entrants should be from the 20 per cent most deprived areas in Scotland).

Compared to the rest of the UK, Scotland benefits from a more centralised and coordinated approach to widening access.¹¹⁶ In England, initiatives like the Office for Students' Access and Participation Plans encourage universities to improve access, but these are more institution-specific and less governed by a unified national strategy. Wales and Northern Ireland also have their own initiatives, but these vary in scope and intensity compared to Scotland's comprehensive approach which includes a collective approach to contextualised admissions, exemplified by a sector-wide agreement and commitment to introduce, and publish, minimum entry requirements for all undergraduate courses. This coordinated approach has made it possible

for subsequent measures, such as all universities in Scotland introducing a guaranteed offer to care-experienced applicants who meet minimum entry requirements.¹¹⁷

The Scottish Government has made moves to support students to access higher education through recent uplifts to student funding, though this has been in the form of loans not grants meaning graduate debt is still a factor for Scottish graduates, but the overall package meets the government commitment to provide a total package of support ‘the equivalent of the Living Wage’.

Challenges and future directions

Despite its strengths, the sector faces several challenges. Financial sustainability is a significant concern, particularly given the cost of maintaining sustainable public funding for Scottish students. The sector also faces pressures related to Brexit, including potential reductions in research funding and the loss of EU staff and students.

Another challenge is ensuring equitable access to higher education across all demographics. While Scotland has made strides in widening access, disparities remain, particularly for rural and remote communities, where just under 25 per cent of school leavers from such areas went on to higher education in 2022/23 compared to over a third in 2009/10.¹¹⁸ The Scottish government continues to prioritise widening access, but achieving these goals requires sustained effort and resources.

A policy to borrow and a policy to keep

It is worth acknowledging that no single policy can provide a panacea for every ill within higher education. It is important to take a pragmatic approach, understanding that while improvements can be made, if there were easy solutions in addressing the complexities of higher education, we would no doubt have applied them before now.

I strongly support maintaining the role of government funding for higher education in Scotland, but we must strive for a more sustainable model that ensures long-term stability for our institutions, staff, students and our wider communities.

I believe we should look to emulate and adopt policies that provide

enhanced support for postgraduate taught (PGT) and postgraduate research (PGR) students, as well as a growing research funding support mechanism, recognising the critical role they play in our academic community and the future success of our sector and the nation.

How English higher education policy has diverged from the rest of the United Kingdom

Dr Emma Wisby

Introduction

This chapter focuses on higher education as teaching and learning, primarily in relation to domestic, full-time undergraduates. This is largely a story of student finance, as successive governments navigated the massification of the sector in the knowledge economy, within a broader acceptance of marketisation.¹¹⁹

The wider education landscape in England

In England, while the route for those aged 16 to 19 wishing to progress to university is clear – via A-Levels and BTECs – it has been criticised for being too narrow. The path to future education or training for ‘the other 50 per cent’ has been far less clear. Despite politicians’ frequent emphasising of the importance of vocational and technical education, for school leavers and lifelong learners alike, this pathway remained the poor relation. This is evident in heavy cuts to funding, churn in sector quangos and repeated often equivocal qualifications reform, as well as comparatively insufficient provisions for student support. The recommendations of the Augar Review of education and funding in 2019 speak to this disparity in treatment across tertiary education.¹²⁰

England’s academic-vocational divide is longstanding. It is reflective, if not a symptom, of the country’s early policy for universal secondary education established through the Education Act (1944) – the system of academically selective grammar schools and non-selective secondary modern and technical schools.

The number of grammar schools peaked in the mid-1960s at almost 1,300, when they accounted for around a quarter of secondary school pupils. Following the switch to a comprehensive system of ‘all-ability’ schools in the 1970s, today just 163 grammar schools remain, educating just 5 per cent of state-funded secondary pupils, albeit concentrated in a small number of local authorities. These schools perform comparatively well on measures of academic attainment, a strong determinant of progression to university, though slightly less so once pupils’ prior attainment is considered. They have relatively few pupils eligible for Free School Meals, or who have special educational needs.¹²¹ (Further discussion on grammar

schools in England can be found in two HEPI reports: *Social Mobility and Higher Education: Are grammar schools the answer?* and *The Impact of Selective Secondary Education on Progression to Higher Education*.¹²²⁾

The independent (fee-paying) school sector in England numbers 2,400 primary and secondary schools, educating 6 per cent of all pupils.¹²³ While it is a diverse sector, the appeal is often the schools' strong academic performance and the fact that their former pupils are disproportionately represented at the most prestigious universities and in the top professions.¹²⁴

For comprehensive schools, changes following the Education Reform Act (ERA) (1988) rested on the assumption that greater school autonomy and diversity plus parental choice would raise standards. This entailed the establishment of new types of schools outside local authority control, from grant-maintained schools through to today's academies. Academies now account for 82 per cent of state secondary schools.¹²⁵ Schools policy in England has made ready use of national testing, performance indicators and school inspection. This has informed parental choice but also steered the sector more directly; for instance, from 2010 to increase take up of 'core' academic qualifications.¹²⁶ Efforts to close the socio-economic attainment gap, as well as the gap in rates of progression to university, have run alongside, though progress has wavered.

The higher education sector in England

In comparison to its neighbours, the English higher education sector is vast. In the 2022/23 academic year, 258 higher education institutions returned data to HESA. This compares with 19 institutions in Scotland, who had the next largest number of HESA-returning institutions. If we broaden this measure to higher education providers registered with the Office for Students (some further education colleges delivering higher education are not required to return data to HESA), there are over 400 registered providers.

There are almost 2.5 million students enrolled in the English higher education system. This compares to fewer than 300,000 in Scotland – again Scotland is the second largest sector by this measure.

The sheer size and diversity of the sector in England means that sector-wide collaboration is challenging and regulation can feel like a 'one-size-fits-all' approach, particularly for small and specialist institutions.¹²⁷

Higher education funding in England

Prior to devolution, the impetus of the ERA was felt in the higher education sector via the switch from block grants to per capita funding and greater external scrutiny of performance. This direction of travel continued with the expansion of the sector as reflected in three pivotal reviews: Dearing (1997), Browne (2010) and Augar (2019), and the government response to their recommendations.¹²⁸ At the time of the Dearing Review, the sector in England numbered 72 universities and 50 'higher education institutions'.¹²⁹ Today, it numbers 258 diverse 'higher education providers' (over 400 if the further education colleges delivering higher education are included), together educating some 2.4 million students.¹³⁰

The Dearing Review paved the way for the reintroduction of tuition fees for undergraduate (and postgraduate certificate) programmes. 'Top up' fees, set at £1,000 a year and to be paid up front, were introduced in 1998. For entrants from 2006, tuition fees increased to £3,000 a year and moved to a system of deferred payment. A new agency, the Office for Fair Access (OFFA), was established to ensure higher fees did not deter people from entering higher education and providers had to make satisfactory commitments on widening participation. Following the Browne Review, the fee cap trebled to £9,000 for entrants from 2012, with the government teaching grant reduced proportionately. At this stage, the salary threshold for the repayment of loans was set at £21,000, and outstanding repayments were to be written off after 30 years.¹³¹

The shift to variable fees might have been expected to introduce greater differentiation in price. Instead, the fee for almost all these courses swiftly rose to the maximum permitted. Attempts to inject greater dynamism included providing more information for prospective students on course quality and outcomes, raising and then removing the cap on student numbers and encouraging new 'challenger' providers.¹³²

Other reforms have kept a hold on the cost of the system to the public purse. They have included:

- a continued freeze on the tuition fee cap at £9,250 since 2017 (only raised to £9,535 from 2025 onwards);
- trimming remaining teaching grants and other allocations;
- freezing or lowering salary thresholds for loan repayment now £25,000, down from £27,295;

- extending the repayment window to 40 years (from 30);
- reverting to the complete replacement of maintenance grants with maintenance loans; and
- real terms cuts to loan levels and related household income thresholds.¹³³

The long-term freeze on tuition fees has been problematic for the higher education sector. This has significant consequences on the financial sustainability of the sector, with an analysis suggesting a sector-wide loss of £1 billion in real income for each of the past three years.¹³⁴

Cross border flows

It is of course important to set the funding trajectory in the context of the wider picture of higher education finances, specifically the growing reliance on the recruitment of international students for whom fee levels are not regulated. This is a feature across the UK nations. International students accounted for a quarter of England's student population (skewed towards postgraduate taught courses). This is despite the reduction in EU student numbers post-Brexit and the disruption from the COVID-19 pandemic. Recent reforms aimed at reducing student immigration have put matters of financial sustainability into sharper focus.

Political and policy divergence

Regulation

The Dearing Report gave the newly established Quality Assurance Agency (QAA) the remit of securing standards and quality in an expanding sector as custodian of UK-wide sector reference points and operator of institutional assessments. In England, the QAA worked alongside the Higher Education Funding Council for England (HEFCE) and the Office of the Independent Adjudicator (OIA), the designated operator of the student complaints scheme from 2005, plus OFFA.

In 2018, a new regulator, the Office for Students (OfS), replaced HEFCE. It also subsumed OFFA. Registered providers must meet the initial and ongoing 'conditions of registration' outlined by the OfS. These include conditions on financial sustainability, access and participation and good governance. In 2023, the OfS also took over QAA's role as the 'designated quality body' for the sector in England.¹³⁵ England's now risk-based approach to quality assurance was not compatible with QAA's continued membership of the

European Quality Assurance Register for Higher Education (EQAR). The QAA retains its assessment role in Scotland, Wales and Northern Ireland.

The OfS has itself come under scrutiny. In 2024, a House of Lord's Industry and Regulators Committee inquiry concluded that the regulator had a poor relationship with higher education providers and students and that it lacked independence from the Government.¹³⁶ A further Independent Review by Sir David Behan (who has since been appointed as the interim chair of the OfS) suggested that the OfS should reprioritise its regulatory focus to cover:

- the quality of higher education, including addressing some of the anomalies noted above;
- the financial sustainability of higher education providers;
- acting in the student interest; and
- protecting how public money is spent.¹³⁷

Widening participation

At least until recently, there have been modest improvements in widening participation (the sector-wide progress on improving access to higher education) for school leavers. There is a more mixed picture in relation to fair access (individual institution's progress on improving access to higher education). Depending on which measure is used, gaps between the most and least disadvantaged students have persisted.¹³⁸ Non-continuation rates and graduate outcomes have become an equally important part of universities' accountability in these respects. The sector's overall retention rate has hitherto been comparatively strong internationally but similarly could be negatively impacted by the current financial pressures.¹³⁹ A range of factors have been cited for the marked decrease in domestic part-time student numbers over the timeframe under discussion, but they include tuition fee policy.¹⁴⁰

Incoming policy divergence

There are a number of new, complex and interacting policies on the horizon in English higher education, some of which reflect the criticisms and recommendations made in the 2019 Augar Review. These new policies include:

- the Lifelong Learning Entitlement (LLE), which will (in theory at least) allow students to study on a modular basis, with their accumulated credit being portable across providers;

- the Growth and Skills Levy – which will provide a mechanism for employers to fund a broad range of training for their employees in place of the current Apprenticeship Levy; and
- the creation of Skills England – a new arm’s length body that will bring together key partners to meet the skills needs of the next decade.¹⁴¹

These upcoming changes point to an increased policy focus on the delivery of skills and a more flexible higher education offer.

A policy to borrow and a policy to keep

The defining matter of tuition fee and student finance policy for domestic undergraduates prompts the question of whether equivalent arrangements in any of the other UK nations present a definitively superior approach in the round. The accompanying chapters highlight the difficult trade-offs, as well as the interconnections between the nations’ approaches. It does seem, however, that England could learn from the other nations’ more generous provisions on maintenance. In particular, the inclusion of maintenance grants.

Scotland has had a single funding council for higher and further education since 2005. Wales has now taken the ostensibly bold step of bringing together oversight of further and higher education and research under a single body, the Commission for Tertiary Education and Research (Medr). The English sector will no doubt look to this with interest as it waits to see whether the current political rhetoric around the need for ‘a tertiary approach’ is any more resolute than previously – and if / how that intersects with greater devolution and collaboration within England.¹⁴²

Postgraduate fees and funding in the four nations

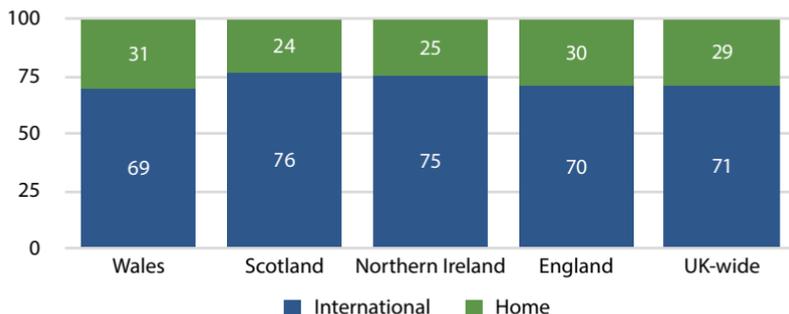
Dr Edward Hicks

The differences between the four nations of the UK in undergraduate higher education are well known. Most prominent are the differences in fees, as already discussed in this report. There are differences in the length of degree, with Scottish degrees typically lasting for four years, whereas the majority of undergraduate degrees elsewhere in the UK last for three years. Depending on the university, Scottish graduates then receive an MA degree, whereas elsewhere in the UK the norm is a Bachelor's degree.

Postgraduate provision across the four UK nations also has distinct similarities and differences. Given the comparatively low publicity that postgraduate education receives compared to undergraduate education, highlighting these differences and similarities demonstrates the varying choices the administrations in the three devolved nations and the UK government have made regarding funding.

Many of the key trends of postgraduate education across the UK apply to each of the four nations of the UK. The majority of postgraduates are on taught courses (PGT), of which the majority are on Master's courses. The minority of postgraduate on research courses (PGR) are mainly, but not exclusively, on doctorate research courses.¹⁴³ Most full-time postgraduates are international students. The proportion of international full-time postgraduate students in each UK nation can be seen in Figure 21.

Figure 21: Full-time postgraduate student populations - UK and International (2022/23)



Source: HESA¹⁴⁴

The majority of part-time postgraduates are from the UK.¹⁴⁵ Nearly half of UK-domiciled part-time students are studying at postgraduate level, and the majority of UK-domiciled postgraduate students are part-time students.¹⁴⁶

The trends of expansion among international students on taught Master's courses, alongside flatlining or reductions among UK postgraduates, are found in each UK nation. The length of Master's and PhD courses, the structures of how they are conducted, and so on, are broadly similar: there is no clearly distinct Scottish approach to postgraduate courses as there is at undergraduate level. In all four nations the fees charged, both for home and international students, are uncapped and unregulated, being entirely at the discretion of the universities, which can charge different rates based on the home address of students and the course being taken.

UK Research and Innovation (UKRI) – overseen by the UK government – runs competitive award schemes for postgraduate students through its research councils (for example the Arts and Humanities Research Council). The usual stipend it pays for tuition fees for PhD students, £4,786 a year for 2024/25, is followed by most UK universities when setting fees for UK-domiciled PhD students. Although Scottish universities were those initially leading the charge in 2003 for the establishment of a UCAS for postgraduates, called UK Pass, it failed to attract more than a handful of institutions.¹⁴⁷ UCAS does provide a search tool to facilitate students to find postgraduate courses, but nothing equivalent to its role in undergraduate admissions. Similar challenges are also faced across the UK nations.

These myriad similarities might lead to the conclusion that the UK postgraduate system is a UK-wide one, into which the differences of historical practice, institutional and national culture, and the devolved institutions have made few inroads. There are, however, subtle differences. For example, in Wales, a higher number of postgraduate taught students are from the UK than outside the UK, in contrast to the other three UK nations. Apart from in Northern Ireland, there are higher levels of mobility between the four UK nations, with a lower proportion staying in the nation of their permanent address for PGT and PGR study.¹⁴⁸

The main difference this chapter focuses on is the difference in postgraduate loans. The loans are not the only source of funding. For eligible students,

additional funding is provided through the Disabled Students Allowance, which is provided at different amounts in each UK nation. Subjects such as social work and teacher training have different funding structures, and childcare support for postgraduate parents differs across the UK, being most extensive in Wales.

Scholarships and bursaries are provided by higher education providers, charities, UKRI and regulatory and funding bodies, for example by the Office for Students for students focusing on AI and data science.¹⁴⁹ Nevertheless, the loans represent a significant source of support for postgraduate students. The latest amounts and terms and conditions are summarised in the table below.¹⁵⁰

UK nation where a person is living	Loans for Master's students in 2024/25	Loans for Doctoral students in 2024/25	Repayment rules	Interest rate
England	£12,471 (for fees and costs) Only covers Master's courses	£29,390	Start repaying when income is at £21,000 a year (£1,750 a month or £403 a week). You repay 6 per cent of your income above the threshold.	RPI +3 per cent (For 2024-25 the interest rate is 7.3 per cent)
Scotland	£7,000 (for tuition fees) £6,900 (for living costs) £2,400 (Special Support Loan for 2024/25)	None	Repayments and interest rate follow Plan 4 of student loans. Repayments start from £31,395 a year (£2,616 a month; £606 a week). You repay 9 per cent of your income above the threshold.	RPI or the Bank Base Rate + 1 per cent, whichever is lower (For 2024/25 the interest rate will be 4.3 per cent)
Northern Ireland	£6,500 (for tuition fees)	None	Repayments and interest rates followed Plan 1. Repayments start from £24,990 a year (£2,082 a month; £480 a week). You repay 9 per cent of your income above the threshold.	RPI or the Bank Base Rate + 1 per cent, whichever is lower (For 2024/25 the interest rate will be 4.3 per cent)
Wales	£18,950 (for fees and costs)	£28,655	Repayments start from £21,000 a year (same conditions as England)	RPI +3 per cent. (For 2024/25 the interest rate is 7.3 per cent)

There are three major differences between the loan systems:

1) The courses and qualifications covered:

- There are loans available for Master's and doctoral students in England and Wales. For Master's students, the maximum amount for students starting in 2024 is greater in Wales than in England. For doctoral students the opposite is (narrowly) the case.
- In Scotland and Northern Ireland loans are only available for Master's courses, not for doctorates. In Northern Ireland, the loans are also available for postgraduate certificate and diploma courses.¹⁵¹ In Scotland the loans are also available for one-year postgraduate diplomas.¹⁵² By contrast, in England the guidance explicitly states diplomas and certificates are not eligible for Master's loans, with the same eligibility followed in Wales.¹⁵³

2) The purpose of the loans and who receive them:

- In England and Wales the postgraduate loans can be used for either fees or for living costs and are available to both full-time and part-time students.
- In Northern Ireland the loan is solely for tuition fees and is available full-time and part-time Master's students.
- In Scotland there is a loan for fees available to both full-time and part-time Master's students. There is a loan for living costs (and a temporary special loan) which are both only available to full-time Master's students.

3) The repayment and interest rate rules:

- The threshold for beginning repayments differs between Scotland (£31,395), Northern Ireland (£24,990), and England and Wales (both at £21,000). The rate of repayment varies – it is 9 per cent above the income threshold in Scotland and Northern Ireland. In England and Wales, because the threshold is lower than for post-2012 undergraduate loan repayments, 6 per cent is repaid on the income between the two thresholds, with 9 per cent above it.
- The interest rate also differs. For 2024/25 it is 4.3 per cent in Northern Ireland and Scotland, and 7.3 per cent in England and Wales.

- These differences in interest rate and threshold reflect the different plans used for loans in each UK nation. In Northern Ireland the loan system for all students follows Plan 1, the scheme established before the 2012 changes in England and Wales. Therefore, the interest rate is calculated by either following Retail Price Index (RPI) inflation, or the Bank of England's Base Rate interest rate plus 1 per cent, whichever is lower. The same approach to calculating interest rates is used in Scotland, but its threshold is different because it follows Plan 4, which is a distinct loan plan for Scotland. England and Wales follow Plan 3, which is the plan for Postgraduate Loans. Under this plan interest rates are calculated as RPI + 3 per cent.

How have these differences come about? They primarily reflect the different approaches taken in the 2010s, when postgraduate loans began to be provided by the respective UK administrations.

From 2012/13 the system in Scotland of tuition fee payments for postgraduate diploma courses was replaced by a loan scheme.¹⁵⁴ By 2015, Scottish students could receive a tuition fee loan of £3,400 and a living cost loan of up to £4,500.¹⁵⁵ A working party was established to look at postgraduate taught provision, but not research provision. Its report was published in December 2015 and recommended a 'clear and universal entitlement to student loan support' for Scotland-domiciled students undertaking taught postgraduate study.¹⁵⁶

A similar consultation was held in Northern Ireland in 2015 on introducing postgraduate loans for postgraduate taught students. Respondents favoured a tuition fee loan rather than a larger, more general, loan, or one restricted to specific subjects. There were concerns that a general loan, similar to that introduced in England for Master's students, would mean onerous repayments for students. There was also strong support for regulating fees and expressing support for extending loans to research students.¹⁵⁷ In response, the Department for Employment and Learning accepted the tuition fee loan idea; but rejected regulating fees.¹⁵⁸ Extending loans to research students did meet with a favourable response from the Department for Employment and Learning: 'The Department will seek to ensure that Northern Ireland system students have access to a similar product [as being introduced in England]'.¹⁵⁹ However, this policy was not subsequently implemented, possibly due to the instability of the Executive

and changes in departmental responsibility from the Department for Employment and Learning to the Department for the Economy.

In 2014/15 the UK government introduced the Postgraduate Support Scheme in England to target under-represented groups in specific subjects.¹⁶⁰ In 2016/17, following announcements made in 2014 and 2015 by the then Chancellor of the Exchequer, George Osborne, a £10,000 Master's Loan was introduced in England. Two years later, a £25,000 Doctoral Loan was initiated. This followed a long-standing campaign to improve support for postgraduate students, both in recognition of the limits of the alternatives and through a wish to promote social mobility by breaking down financial barriers.¹⁶¹ The loans were purposefully not designed to cover all costs and did not distinguish between fees and living costs.

Wales introduced Master's Loans in 2017/18 and Doctoral Loans in 2018/19. In addition, the Diamond Review in 2016 advocated for equal treatment between undergraduate and postgraduate students and between full-time and part-time students, which resulted in the introduction of a mixture of grants and loans, the balance being means-tested and all recipients receiving a minimum £1,000 grant.¹⁶²

In England, the immediate impact of the Master's Loan was an increase in Master's students, including students from disadvantaged backgrounds.¹⁶³ There was less of a discernible uplift in doctoral student numbers, attributed to the loan not being thought sufficient to cover fees and living costs.¹⁶⁴ More recently, the number of students taking up Master's Loans fell in 2022/23, for the second consecutive year, taking the number of borrowers to below the level seen each year since 2017/18. This reflects a drop in England-domiciled students entering postgraduate taught courses in 2022/23, and early figures from the Office for Students suggest a further fall in 2023/24.¹⁶⁵

Concerns have been raised that the Master's Loan has not kept pace with increases in fees for home students.¹⁶⁶ There was also a small drop in the number of students taking up Doctoral Loans in 2022/23, compared with 2021/22, though this remained higher than in preceding years. Early indications suggested further reductions in 2023/24 in numbers of borrowers and data in June 2024 showed a reduction in the total amount of loans paid out.¹⁶⁷

While in England the loan system has remained largely unchanged, there have been reforms in Wales and Scotland. In December 2023, the Welsh Government's Draft Budget proposed that the grant element of postgraduate funding would be withdrawn, being replaced by a loan for new students from the 2024/25 academic year.¹⁶⁸ Rejecting calls by the Senedd's Children, Young People and Education Committee to reconsider this decision, the Welsh Government argued that:

- Postgraduate education was less important than undergraduate in developing life chances.
- The shift from grants to loans was not expected to significantly impact participation, not least because of the generosity of support to Welsh students and the terms of loan repayments.
- Deciding to undertake advanced study is one for the individual to make, and much of the return would come to the individual rather than society.¹⁶⁹

The latest student loan figures for 2022/23 showed that the number of Wales Master's loans fell to 5,900, a second consecutive year of reduction in take-up, and a number of borrowers lower than every year since 2019/20. The number of students receiving the Postgraduate Master's Grant, then still provided, also fell in 2022/23 compared to the two preceding years. By contrast, there was a 5.6 per cent increase in the number of students receiving the Doctoral Loans. Early indications suggested reductions in the take-up of Postgraduate Loans in 2023/24, and in June 2024 statistics showed a fall in the amount of money lent out to students.¹⁷⁰

In Scotland, the SNP Scottish Parliamentary manifesto in 2021 promised a review of postgraduate support. A review has been established which proposed various reforms in August 2023:

- Increasing the size of the tuition fee loan from £5,500 to £7,000 to take account of inflation.
- Extending access to Scotland's postgraduate support to full-time and part-time students staying at Scottish private providers, and full-time students studying at private providers elsewhere in the UK.
- Extending access to postgraduate funding for students studying eligible

postgraduate courses in other parts of the UK (previously this was only available if there was not an equivalent course available in Scotland).

- Not to extend the loans to cover postgraduate certificates, concluding there was a lack of demand among providers, students and stakeholders.¹⁷¹

In January 2023, the Scottish Government had stated it did not intend to extend postgraduate loans to PhD students.¹⁷² Instead, it highlighted that £36.9 million is allocated through the Scottish Funding Council's Research Postgraduate Grant, a block grant paid to universities based on the number of PGR students enrolled and a subject weighting, which rose to £37.9 million in 2024/25.¹⁷³ The total number of full-time students supported through postgraduate loans fell from 7,750 in 2022/23 to 7,615 in 2023/24, but the amount of funding per student rose from £7,030 to £7,930.¹⁷⁴

In Northern Ireland, in place of doctoral loans, there is the postgraduate research award scheme, which includes awarding studentships provided by the Executive's Department for the Economy, and the Department for Agriculture, Environment and Rural Affairs.¹⁷⁵ A consultation on the existing postgraduate tuition fee loan in 2022 also highlighted the lack of loans for PGR students. Responses strongly supported raising tuition fee loans in line with inflation.¹⁷⁶

In response, the then Economy Minister, Gordon Lyons, announced a wider review of higher education funding, and to raise the amount of postgraduate loan to £6,500 in one go.¹⁷⁷ This position was reaffirmed by the new Economy Minister, Conor Murphy, when power-sharing was restored in 2024.¹⁷⁸ The Northern Ireland Department for the Economy launched a consultation reviewing the awards on 1 August 2024. This will explore the options of either:

- i) carrying on with the existing scheme;
- ii) making it more targeted;
- iii) increasing the number of awards from 729 to 1,000;
- iv) reducing funding by 50 per cent or 80 per cent; or
- v) closing it entirely, reallocating the money to block grant research and innovation funding.

The consultation document also mentioned that any changes to the scheme would require consideration of further changes such as the 'introduction of additional support for postgraduate study, such as the introduction of a PhD loan facility'.¹⁷⁹ In 2022/23 there were reductions in the number of students taking up postgraduate loans, with early indications of an additional fall in 2023/24 and data in June 2024 showing a reduction in the total amount of loans paid out.¹⁸⁰

One consequential question is: have the different funding systems noticeably impacted the numbers entering postgraduate courses across the UK? The data on entrants published by HESA would suggest only limited differences. For example, among postgraduate research (PGR) students, comparing entrants in 2018/19 with 2022/23, the number of Scotland-domiciled PGR students studying across the UK fell by 9.9 per cent from 1,775 to 1,600. The proportion from Northern Ireland fell by 3.6 per cent (415 to 400) and those in Northern Ireland by 1.7 per cent (300 to 295). This compares with more significant reductions among England and Wales domiciled PGR students, where numbers fell by over 13 per cent in both cases.¹⁸¹

Among those embarking on postgraduate taught (PGT) studies, entrants onto Master's taught courses in England and Wales did rise in 2022/23 compared with 2018/19, whereas those in Scotland and Northern Ireland fell. Overall postgraduate-taught student entrants increased in each of the four nations. In Scotland and Northern Ireland this appears to have resulted mainly from more part-time students studying PGT modules which did not explicitly lead to a postgraduate qualification and so would not appear to result from a more generous treatment in the loan system; nor did full-time PGT student numbers in Scotland change markedly differently from part-time PGT students despite the differences in maintenance support.

There was very little difference in the graduate outcomes for postgraduates educated across the UK. Among the most recent graduating cohort in 2021/22 approximately 80 per cent went into full-time or part-time employment.¹⁸² There was a notably higher proportion of postgraduate research graduates in Northern Ireland on fixed-term contracts (43 per cent) against the UK as a whole (33 per cent) and other UK nations.¹⁸³ We can also compare the salary levels for postgraduates who go on to full-time employment. In terms of those earning £51,000 or more (the highest pay

band in HESA's *Graduate Outcomes* survey) this was the highest in England, then Scotland, then Wales and lowest in Northern Ireland. Overall, 20 per cent of men at all UK higher education providers and 11 per cent of women reported earning over £51,000.¹⁸⁴ Lastly, the rise in PGT student numbers during the COVID-19 pandemic makes it hard to assess the potential effects of the different PGT loan and grant systems.¹⁸⁵

The consultations in Northern Ireland and in Scotland, and the recent changes in Wales, raise certain key questions regarding the comparisons between the four nations:

- Do the reductions in PGR numbers demonstrate that the loan approach in England and Wales has proven ineffective in raising entrants, compared to the approach on awards being used in Scotland and Northern Ireland?
- Does the system in England and Wales, where students are free to spend their loan on fees or living costs as they wish, work better than one where a distinction is made between fees and maintenance support in Scotland and Northern Ireland?
- Which postgraduate taught qualifications should be eligible for the loans?
- Do the different funding systems – both the loans and the provision of alternative sources of funding from governments, universities and other bodies, impact the willingness of potential postgraduate students to apply?

This chapter was originally published as a HEPI blog in October 2024

Endnotes

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December 2024 978-1-915744-35-7

Higher Education Policy Institute

99 Banbury Road, Oxford OX2 6JX

www.hepi.ac.uk

Printed by BCQ, Buckingham

Typesetting: Steve Billington, www.jarmanassociates.co.uk