

### Contents

Executive Summary	1
Introduction	1
Respondent Profile	1
Main Findings: Greater alignment of financial support for students	2
Main Findings: A simplification and clarification of the systems	2
Main Findings: Better communication of the funding available	
Main Findings: Further consideration of the levels of funding required	3
Introduction	5
Background	5
Respondent Profile	5
Methodology	6
Greater alignment of financial support for students	7
A simplification and clarification of the systems	13
Better communication of the funding available	17
Further consideration of the levels of funding required	23
Other comments	31
Appendix: Respondent organisations	1

### **Executive Summary**

#### Introduction

The Independent Review of Financial Support for Students in Scotland Consultation asked for views on the key preliminary findings of the review group; these included support for:

- Greater alignment of financial support for students across colleges and universities with increased fairness in what all students can access.
- A simplification and clarification of the systems used to provide financial support to students in Scotland today.
- Better communication of the funding available, including a clear explanation of the repayment terms of students loans.
- Further consideration of the levels of funding required for all students and the funding mix.

The consultation ran from 30th June to 31st August 2017.

### **Respondent Profile**

98 organisations and individuals, from the following respondent sub groups, submitted a response to the consultation:

**Respondent Groups** 

	Number
Student representation	17
Inclusion groups and organisations	11
Colleges	9
Universities	7
Unions (staff)	3
Other	5
Total organisations	52
Individuals	46
Total respondents	98

#### Of the 46 individuals:

- 17 said they were 'Employed in an education institution'.
- 12 identified as 'Currently a student studying a course at a university'.
- 3 identified as 'Currently a student studying for a Higher National Certificate (HNC) level qualification or above at a college'.

 14 were other types of individuals covering a wide variety of interests such as parents, student association officials, graduates and potential students among others.

### Main Findings: Greater alignment of financial support for students

Most of those who replied felt that there should be parity in funding levels available to all students, based more on need rather than the level of study.

In relation to achieving parity and maximising the income available to students, one main theme related to the need for funding to be means tested or based on a sliding scale related to household income. Respondents wanted to see this for both FE and HE students. However, there were concerns over the use of this type of assessment, including issues for young people who are estranged from their parents. There were also concerns that while the assessment may suggest some level of parental support, some parents may not be able or willing to provide this.

Another theme related to suggestions that assessment should take account of each student's needs and circumstances.

Several respondents, particularly individuals but also some from the college and student representation groups, said they did not want to see loans for FE students. A variety of reasons were given including concern over any potential impact on bursaries or benefits and concern over any increased level of debt in general.

On the question of achieving parity in funding without having a negative impact on benefits, many respondents stressed that students should not be worse off because they are in education.

Several commented that there should be no loss of benefits for those entering education. Several others wanted to see funding system designed to allow for increased bursaries to counteract any loss of benefits.

Many respondents felt that the most effective way to determine which students are most in need of bursary support was through means testing household or personal income. However, many of these respondents felt that this alone would not be sufficient and should be combined with an assessment of individual circumstances.

### Main Findings: A simplification and clarification of the systems

When asked about the key features of the current system that may deter or make it more difficult for students to access, or stay in college or university, respondents identified a large number of features.

These related mainly to: bureaucracy (for example, the length and complexity of the application process); finance (such as worry over the burden of debt); and individual circumstances (including concern over the 100% attendance rule for FE students).

When asked to provide ideas for how the administration of student support funding could be improved and made fairer for all students at college or university, respondents commented on the need to address the issues raised above.

Respondents also put forward a large number of suggestions as to current rules and/or practices in place that make it harder to access or maintain study. Again, the need to remove the 100% attendance requirement for FE students, especially for students with children, was mentioned. Respondents also wanted to see students able to spread their funding payments over 12 months rather than just within term time or to have access to a discretionary fund over the summer months. The need for consistency and for clear, up to date information also featured, amongst many other suggestions.

In relation to improving the way in which financial support is delivered to students at college or university, respondents again commented on the need to allow payments to be spread over 12 months. There were also comments on the need to ensure no delays to payments as well as the need for a living wage and the need for any system to be flexible in order to deal with individual circumstances.

### Main Findings: Better communication of the funding available

When asked what type of information on funding would be helpful to students – both prospective and continuing, respondents put forward a large number of suggestions. Some of these included: an online calculator; the need for clear and concise information; the need for tailored, rather than generic, advice; and the need for information to be made available through schools.

Respondents wanted to see information made available in a variety of ways and formats including online, hard copy, video, mobile app and face to face.

In relation to when potential students should first be given information on financial packages of student support, the main theme to emerge from responses was for potential students to be given the information at the pre-application stage.

In relation to the role that colleges, universities and schools could play in providing information on student support, a small number of themes emerged and these related to the need for clear and up to date information on funding streams, on how to apply and on timelines. Several respondents suggested workshops or other support for completing funding applications.

When asked what more could be done to support parents/guardians to better understand the student support funding available, respondents suggested that information could be provided through schools, including at parent evenings, via Parent Teacher groups, or at school information sessions. Respondents also wanted to see information provided in a variety of formats.

The provision of clear, concise, accurate, up to date and jargon-free information, in a variety of formats, was seen as the best ways to help students understand more about student loans, including how and when they are repaid.

# Main Findings: Further consideration of the levels of funding required

Most of those who replied said that a 'minimum income' guarantee should be introduced across all students. The main comments from the few that disagreed included the need to take circumstances into account or the need for more information as to what a 'minimum income' guarantee would involve.

When asked what the 'minimum income' guarantee should be, and why, respondents gave a variety of different responses. However, on the question of whether this should be linked to the Living Wage, most respondents who commented on this issue said it should. There were a number of calls for the link to be with the Scottish Living Wage. The main comment relating to the circumstances under which a 'minimum income' should apply was that the minimum should apply to all students.

Although few respondents provided numerical examples of the appropriate balance of bursary / loans within a 'minimum income', most commented that it should depend on circumstances or need.

Several suggested some form of sliding scale depending on need or household income.

Several supported a move towards a bursary-only scheme, although there was some acknowledgement of the financial difficulties around this.

Several respondents said the balance should be more bursary than loan; a small number of individuals suggested the loan proportion should be higher than the bursary.

When asked whether all students should have the option to access student loans, regardless of their level of study at college or university (in addition to existing bursary entitlement), there was a mixed response. However, more were in favour than were against access to student loans for all students. Overall, almost half of those who replied voiced support while around a third voiced their opposition.

The main theme to emerge amongst those who were supportive was simply that loans should be available for all students.

Those opposed to loans for all students gave various reasons including concerns over: any impact on benefits or bursaries; the increased level of debt in general; and the level of debt for FE students who progress to HE.

Looking at ways that the terms and conditions attached to student loans could be reviewed to support consideration of extension to all students, the main theme from responses was the need to reconsider the repayment threshold.

Several respondents wanted to see this increased and suggestions included raising the threshold in line with other countries in the UK or in line with the Scottish graduate wage of £21,000.

Respondents also commented on the need for loans to be interest-free or low-interest.

### Introduction

### **Background**

In October 2016, the Scottish Government appointed Jayne-Anne Gadhia as independent chair of a Review into the Effectiveness of the Student Support System in Scotland. The Review was set up to assess whether college (further education: FE) and university (higher education: HE) students receive a fair and effective package of support, and to make recommendations for improvements. The Review's remit included examining the most effective support for the poorest and most vulnerable students, the balance of support available to those in further and higher education and the current repayment threshold and period for student loan debt.

In June 2017, the Review group launched a consultation asking for views from a wider audience on their key preliminary findings. It is intended that these views will inform the Review's recommendations in the final report due in Autumn 2017. The consultation ran from 30<sup>th</sup> June to 31<sup>st</sup> August 2017 and this report presents a summary of the findings from the responses.

### **Respondent Profile**

There were 98 responses to the consultation: 52 from organisations and 46 from individuals.

Respondents were assigned to respondent groupings in order to enable analysis of any differences or commonalities across or within the various different types of organisations and individuals that responded. A list of all those organisations that submitted a response to the consultation and agreed to have their name published is included in Appendix 1. The following table shows the numbers of responses in each analysis group.

**Respondent Groups** Number Student representation 17 Inclusion groups and organisations 11 9 Colleges Universities 7 Unions (staff) 3 Other 5 **Total organisations** 52 Individuals 46 **Total respondents** 98

The student representation group includes respondents from Student Associations, Unions and other groups supporting students.

The inclusion group incorporates a variety of organisations providing support or advice to people from specific groups related to, for example, religion, physical disabilities or family circumstances.

#### Of the 46 individuals:

- 17 said they were 'Employed in an education institution'.
- 12 identified as 'Currently a student studying a course at a university'.
- 3 identified as 'Currently a student studying for a Higher National Certificate (HNC) level qualification or above at a college'.
- 14 were other types of individuals covering a wide variety of interests such as parents, student association officials, graduates and potential students among others.

### Methodology

Responses to the consultation were submitted using the Scottish Government consultation platform Citizen Space or by email or hard copy.

It should be borne in mind that the number responding at each question is not always the same as the number presented in the respondent group table. This is because not all respondents addressed all questions; some commented only on those questions or sections of relevance to their organisation, sector or field of interest. The report indicates the number of respondents who commented at each question.

Some respondents did not use the consultation questionnaire and, instead, presented their views in a report or letter format. Wherever possible, researchers assigned relevant sections of these documents to the relevant questions in order that all comments on similar issues could be analysed together.

Some of the consultation questions contained closed, tick-boxes with specific options to choose from. Where respondents did not follow the questions but mentioned clearly within their text that they supported one of the options, these have been included in the relevant counts.

The researchers examined all comments made by respondents and noted the range of issues mentioned in responses, including reasons for opinions, specific examples or explanations, alternative suggestions or other comments. Grouping these issues together into similar themes allowed the researchers to identify whether any particular theme was specific to any particular respondent group or groups. When looking at group differences however, it must be also borne in mind that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups did not share this opinion, but rather that they simply did not comment on that particular point.

While the consultation gave all who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population outwith the respondent sample.

A small number of verbatim comments, from those who gave permission for their responses to be made public, have been used in the report to illustrate themes or to provide extra detail for some specific points.

# Greater alignment of financial support for students

#### **Summary:**

Most respondents agreed that there should be parity in funding levels available to all students, based more on need rather than the level of study.

Key themes emerging throughout this section included:

- The need for funding to be means tested or based on a sliding scale related to household income.
- That assessment should take account of each student's individual needs and circumstances.
- That the funding system needs to ensure that students in receipt of benefits do not see any decrease in their income.

The consultation began by asking about parity in funding.

### Question 1.1: Should there be parity in funding levels available to all students, based more on need rather than the level of study?

As shown in the table below, most (70) of the respondents who replied to this question said **yes.** Five, all individuals said no.

Question 1.1

								01.011 111
	Student Representation	Inclusion	Colleges	Universities	Unions (staff)	Other	Individuals	TOTAL
	(17)	(11)	(9)	(7)	(3)	(5)	(46)	(98)
Yes	11	8	7	6	-	3	35	70
No	-	-	-	-	-	-	5	5
Other comment	2	-	1	1	-	2	2	8
No reply	4	3	1	-	3	-	4	15

8 respondents did not specify a yes or no answer but made other comments. These included a comment on the different levels of funding currently available for FE students, depending on age and status, and on different funding awards from different colleges.

There was also a comment on the 3 different household income limits used across FE and HE funding and the need to bring these in line with each other and with UK average earnings.

Also in relation to household income, one respondent wanted to see consideration given to the circumstances of students who may belong to more than one household as well as to adult returners who may be supporting children who are students.

#### Other comments included:

- A query over the definition of 'need'.
- A comment on the time some students have to spend on placements in addition to studying.
- Support for financial awards being calculated according to the Scottish Living Wage.
- That funding should reflect both the cost of living and individual needs and circumstances.
- A comment that it is confusing to propose parity based on need as basing funding on need acknowledges that different students need different levels of support, whereas the word parity indicates equal funding for all.

### Question 1.2: How could parity be achieved and how can we maximise the income available to students?

78 respondents replied to this question and made a variety of suggestions. Most of the points made here recurred at different questions throughout the consultation.

One main theme, seen in responses across respondent groups, was for funding to be means tested or based on a sliding scale related to household income. Respondents wanted to see this for both FE and HE students. However, there were concerns over the use of this type of assessment, including issues for young people who are estranged from their parents. There were also concerns that while the assessment may suggest some level of parental support, some parents may not be able or willing to provide this.

Another theme, again across respondent groups, related to suggestions that assessment should take account of each student's needs and circumstances.

Several respondents, particularly individuals but also some from the college and student representation groups, said they did not want to see loans for FE students. A small number said they wanted to see bursaries for all students or commented on the need to maximise grants and minimise the use of loans.

Commenting on the continuing rise in loan debt, a student representation body said: "Student debt cannot keep increasing in this way. It is therefore absolutely imperative that any increases in student support must come through bursaries rather than loans – in particular, priority must be given to those in the lowest household income brackets". This respondent supports a guaranteed right to bursaries for FE students.

A small number commented on the need to ensure that students remain entitled to benefits.

As well as parity between FE and HE students, a small number commented on the need to ensure parity for all students, for example care experienced, carers, those in need of

mental health support and disabled students who, respondents felt, can be worse off than other students because of specific needs.

There were calls to simplify the funding system to help ensure parity. However, there were also calls for flexibility to allow individual circumstances to be supported.

A small number commented on the need for a living income, perhaps reflecting the Living Wage.

# Question 1.3: How can parity in funding be achieved without having a negative impact on benefits?

66 respondents commented with many stressing that students should not be worse off because they are in education. The main points raised in relation to preventing any negative impact on benefits are outlined below.

Several of those who commented, from across different respondent groups, felt that there should be no loss of benefits for those entering education.

Several others, again across different respondent groups, wanted to see the student funding system designed so that any loss of benefits can be counteracted by increased bursaries. There were a number of mentions of the introduction of Universal Credit with respondents saying that this will mean fewer FE students can remain on benefits, with comments on the need to ensure they do not suffer financially due to this change.

A small number commented that if it is more financially advantageous for students to remain on benefits then this should be allowed; for example those with young children who are in receipt of Income Support or those on Employment Support Allowance. One individual pointed out that remaining on benefits could be more secure as a bursary may not be awarded.

Respondents also commented on the devolution of powers and wanted to see the SG look at ways to use their powers to ensure that students accessing benefits are not disadvantaged and that the system supports those in most need. One respondent, from the university group, suggested that the SG should be able to protect some benefits and could ensure that any loss of those benefits reserved to the UK Government could be compensated through a top-up mechanism.

There were calls for student funding bodies and the SG to work closely with the UK Government Department for Work and Pensions (DWP) to understand the implications of any changes in the benefits or in the student funding systems.

A number of respondents, from various groups, commented on the need for centralised information on tax and benefits, or access to this information for those concerned with student funding. A college respondent felt that allowing colleges access to this information would reduce reliance on students to providing documentation and could make processing applications more efficient.

A small number raised the issue of FE students being able to continue to claim benefits while HE students cannot, with a respondent from the inclusion group commenting: "If there was to be parity in funding across FE and higher education (HE) then we would be keen to see a system that supports students who are eligible for social security benefits to

remain mainly on those benefits, rather than having to come off the security of social security benefits. It would also be much better for students who are eligible for benefits not to have to take on debt in the form of a student loan".

A respondent from the 'other' group commented on the need for additional funding:

"The funding allocated to FE student support is from a fixed sum of money allocated by the SFC directly to colleges and is subject to redistribution towards the end of the calendar year to ensure all colleges have the funds required to meet their student support needs for the remainder of the academic year. FE students who are on benefits when they apply for their course may currently stay on benefits depending on their individual circumstances and at present therefore, they may not utilise this fund. If the student support review recommends that this model continues, consideration must be given to the additional capacity and resource which colleges will need to maintain student support at the current level. This pot is currently insufficient and topped up with significant funds by each college. As an example, one college which has one of the highest proportions of SIMD40 students in Scotland, topped up their allocated fund by £450,000 last academic year."

A small number mentioned Child Benefit and Child Tax credits, which parents of those in FE can continue to access but those in HE cannot. These respondents wanted to ensure that family income is not impacted by any changes in these areas that relate to student funding.

There were also comments on the fact that student loans are included in income assessments; whether or not the student has chosen to access the loan. These respondents, mainly from the student representation and university groups, wanted to see loans excluded from the calculation.

A number of other points were raised including:

- The need to simplify the housing benefit system.
- The need to pay housing benefit (and job seekers allowance) in the summer holidays.
- That the overall amount available for student funding will need to be increased in order to ensure there is no negative impact.
- The need to not only ensure there is no financial impact but also to provide an incentive to study rather than remain on benefits.
- The need to look at benefits and funding in relation to specific groups such as care experienced students.

A small number suggested that student support could become a top-up to benefit support.

One inclusion respondent included a detailed suggestion for a separate funding system for students eligible for benefits, with examples to illustrate how this might work. They also provided an alternative to this suggestion; a different funding package for students eligible for benefits.

# Question 1.4: What is the most effective way to determine which students are most in need of bursary support?

70 respondents commented at this question and while many, from across respondent groups, suggested that the current system of means testing household or personal income should continue, a large proportion of these respondents also felt that this alone would not be sufficient but should be combined with an assessment of individual circumstances.

A smaller number suggested basing assessment of need on individual circumstances only.

Several, while suggesting the use of household income, also commented that this may not be suitable as some parents cannot or will not provide financial assistance. One respondent from the student representation group felt that any assessment should not include parental income. There were also comments on the need to review the use of household income and include other factors such as the number of children or students within a household or to look at expenditure as well as income.

Different suggestions for individual circumstances, made by respondents, for consideration within an assessment included:

- Caring responsibilities.
- Health / disability.
- Benefit status / entitlement.
- Dependent children / childcare.
- Lone parents.
- SIMD.
- Care experienced.
- Mental health difficulties.
- Minority students.
- International students.
- Refugee students.
- Young independent.
- Any circumstances that affect the ability to work outwith studying.
- Rurality.
- Travel distance.
- Level of study.
- Type of course (with a suggestion, from a respondent in the 'other' group for an NHS bursary).

A small number suggested having set criteria but with flexibility to allow local autonomy.

While one college respondent commented that the current system of colleges assessing entitlements works well, respondents from the student representative group said that while this should continue, additional funding should be made available for FE students until there is parity with HE funding.

#### Other comments included:

- That means test thresholds should be in line with UK average earnings (college).
- That all students should receive the same and that this should be based on the living wage (student representation).
- The need for accurate and up to date information on the cost of living (student representation).
- The need for an Equality Impact Assessment of any funding system (inclusion).
- The need for access to centralised financial data (individual).
- That age restrictions on HE grants should be removed (individual).
- That the use of loans should be increased, rather than bursaries (individual).

Several respondents commented on the importance of discussing circumstances with students in order to gain the full picture. There were also comments on the need to utilise information from those advising or supporting a student; one respondent from the inclusion group suggested that the named person could play a role.

# A simplification and clarification of the systems

#### **Summary:**

When asked about the key features of the current system that may deter or make it more difficult for students to access, or stay in college or university, three main areas emerged:

- Bureaucracy; issues around the application process.
- Financial support; including the level of support and the burden of debt from loans.
- Individual circumstances; the need for specific support for specific groups, as well as support tailored to the individual.

Some issues identified by respondents throughout this section included:

- Concern over the 100% attendance rule in colleges.
- The need for support during the summer months or the need to provide payments spread over 12 months.
- The need for the system to allow flexibility to deal with individual circumstances.
- The need for clearer, more accessible information.

The second section looked at any issues with the current systems. Many of the points raised at the questions in this section were repeated by respondents at each of the other questions.

Question 2.1: What are the key features of the current system that may deter or make it more difficult for students to access, or stay in college or university?

85 respondents replied to this question. A number of themes emerged in responses across respondents groups and these related to:

#### Bureaucracy:

- The length and complexity of the application process.
- That the system is confusing and complicated and that information is not easily accessed or easy to understand.
- The difficulties in accessing some information; particularly for students estranged from their parents.
- o That some requests for documentation are excessive / duplicated / intrusive.
- o The need for a single application to cover all funding streams.
- That the SAAS is remote and inaccessible; that it can take a long time to rectify mistakes; that it is difficult to contact by phone; that the information it provides is confusing.

#### Finance:

- That students worry about the burden of debt from loans.
- o That financial support is not sufficient.
- Financial issues caused by delays between leaving and re-accessing benefits and receiving student support.

- That some parents are not able to provide support.
- The need for funding during the summer months; support for spreading payments over the whole year.
- That FE students do not always know what they will receive until the course starts.
- Lack of finance for childcare.
- Lack of finance for travel.
- Lack of finance for placement costs.
- o Lack of finance for course materials / equipment.
- Lack of suitable student employment opportunities.
- Delays in receiving payment due to difficulty providing evidence.
- o Issues caused by housing support rules.
- Issues caused by loss of benefits.
- Concern around a lack of access to bursaries for those who are moving to a similar level course, rather than a higher level course.

#### Individual circumstances:

- Concern over the use of the 100% attendance rule in colleges; this is especially difficult for students with children / care responsibilities; seen as unfair as it does not exist in the HE system.
- The need for support (financial and other) for students from specific groups;
   those with a disability, those from deprived areas.
- Lack of financial support specifically for accommodation. Allied to this; that the issue of homelessness for estranged students who do not have family to return to in the summer months is unrecognised.
- Some students feel unable to use interest-bearing loans for religious reasons.
- Issues around moving to independent living; particularly for those who have just left care.
- Lack of support during the summer months; especially those who have left care and have no family support.
- Lack of interpreters for British Sign Language or insufficient funds to pay for this
- Lack of mental health support.
- That students are unable to claim carers allowance.
- "Generalisation of definition of 'independent' does not take into account individual circumstances of 'estranged' students and/or different degrees of family support / family capital" (inclusion).
- o The need for parity in support for FE / HE disabled students.
- Difficulty in accessing social care support for disabled students with more complex needs.

Respondents from the college group identified an issue around the timing of guidance issued from the SFC to colleges: "Guidance from the SFC being issued to Colleges in May is not conducive to increased access to funds on a timely basis".

This group also mentioned issues caused by the SAAS cut-off date which does not fit with college recruitment.

# Question 2.2: How could the administration of student support funding be improved and made fairer for all students at college or university?

72 respondents answered and most mentioned the need to address the issues raised at the previous question.

Some other suggestions made at this question included:

- The need for local administration.
- The need to allow for local flexibility.
- That funding should be based on need.
- The need for consistent attendance criteria and policies across colleges.
- The need for parity in FE support funding.
- The need for parity in support for FE and HE students.
- The need for a single, centralised funding application and system for colleges and universities.
- The need for simple, centralised information and application.
- The need to raise the repayment threshold.
- The need for travel bursaries.
- The need to consider part-time students in HE who are largely excluded by current rules.

# Question 2.3: Do any of the current rules and/or practices in place make it harder to access or maintain study?

73 respondents replied with most giving examples of rules and/or practices that they feel make it harder to access or maintain study. These included:

- Lack of access to benefits over the summer months; being able to spread payments over 12 months.
- The need for a national summer discretionary fund.
- The need to remove the 100% attendance requirement for FE students; especially for students with children.
- The need for funding guidance to be applied consistently within colleges.
- Consistency around access to hardship funds outwith term time.
- The need for face to face advice before applying and during the application process.
- The need for clear, up to date information.
- That funding should be based on need.
- The need for earlier or up-front payments for FE students.
- Issues around the gap between accessing benefits and student funding being paid.
- Having to reapply for additional help in cases where there is an ongoing condition (e.g. dyslexia).
- Issues around evidencing parental circumstances; or evidencing estrangement.
- The need for high quality communication support for deaf students.
- Lack of access to Housing Benefit.
- That all students should qualify for a bursary.
- The need to share innovative ideas to establish a more efficient and effective system.

- The need for a simpler, clearer system and application process.
- The need to cut down on unnecessary paperwork.
- Issues around SAAS late application rules.
- Delays in funding caused by students having to make changes to their application.
- The need to align payment dates with the academic year for each institution.
- A suggestion that there should be a citizen's income.

### Question 2.4: How could the way in which financial support is delivered to students at college or university be improved?

64 respondents commented and, again, most of the points made were similar to those seen at earlier questions in this section, for example:

- The need for flexibility to spread payments over 12 months if students prefer.
- The need for a living income.
- The need for the system to allow flexibility to deal with individual circumstances.
- Issues around timing; that students may drop out because of a delay in finding out their entitlement; or because of a delay in receiving support.
- Issues around providing evidence of parental income or circumstances.
- The need for local face to face advice.
- The need for consistent advice.
- The need for better / clearer advice.
- The need for clearer information on eligibility.
- The need to simplify the criteria.
- Removing red tape.
- Issues caused by the cap on the Disabled Students Allowance, particularly for deaf students who require specialist equipment and support workers.
- Offering the choice of payment dates to suit money management.
- The need for a student travel card.
- The need for grants rather than loans.
- That the application process would be better done online.
- The need for funding for postgraduate students.
- The need for better financial education and money management support.
- Removing the 100% attendance rule in colleges.
- The need to take cost of accommodation in each area into account.
- The need for earlier payments; the need for payments to help cover upfront costs such as rent deposits.

A respondent from the college group provided details of their bursary management system.

# Better communication of the funding available

#### **Summary:**

Looking at information that would benefit students, respondents identified:

- An online calculator to help students work out their funding entitlement.
- The need for clear, simple, concise information.
- The need for information to be provided in schools.
- The need for more tailored advice.

When asked how best information could be provided, respondents identified a variety of ways including online, hard copy, video, mobile app and face to face.

Respondents felt that information on financial support should be provided at the preapplication stage.

Information for parents could be provided through schools, including at parent evenings, via Parent Teacher groups, or at school information sessions.

Respondents felt that students could be helped to understand more about student loans if the information provided was clear, concise, accurate and jargon-free.

Section 3 looked at the provision of information.

## Question 3.1: What type of information on funding would be helpful to students – both prospective and continuing?

76 respondents commented on this question and, as with the previous section, respondents made a large number of different suggestions.

One suggestion, seen in responses from various groups, was for an online calculator to help students work out their funding entitlement, for example a respondent from the college group said: "Offering an eligibility calculator system for all support funds and guidance on how they can source the documentation required to support their application would assist students throughout the process".

The need to have clear, simple, concise information was also suggested by respondents with additional suggestions that this would be best if available from one location, and suitable for parents, students and other relevant parties.

Several respondents commented on the need for information to be available through schools.

Specific information identified by respondents included:

- More information on interest rates, repayment rates and terms.
- Information on how student support interacts with benefits.

- Signposting to relevant support agencies.
- Case studies showing how the rules apply in various circumstances.
- Information on the full range of available support and how to access this, including timelines.
- Clear information on the documentation required.
- Debt advice.
- Information on emergency funding.
- Clear explanation of the terms used including grants, bursaries and loans.
- Information on alternative sources of funding.
- The need for a resource similar to that provided by SAAS but for FE students.

Respondents commented that current information is very generic and that there needs to be provision for tailored advice; particularly for those students with specific needs and also to take into account any local college variations. One college respondent gave examples of good information guides that could be developed for this purpose. Others mentioned the usefulness of the Child Poverty Action Group Scotland's advice line for staff and advisers, as well as the handbook and factsheets relating to benefits for students in Scotland that are available on their website.

A small number were critical of the SAAS website, for example: "The SAAS website is as clear as mud-it's difficult to navigate and find relevant information, if you're not used to it" (individual). However, a small number also said that the information provided by the SAAS was sufficient.

The need for face to face advice as well as advice available in hard copy and online was also mentioned by several respondents. Allied to this, an inclusion respondent mentioned the need for continuity of support.

A respondent from the student representation group wanted to see materials designed for young people and piloted on prospective students.

There were also calls for better financial education.

# Question 3.2: How and where should that information be made available? Would a particular format be more helpful?

36 respondents replied to the first part of the question; how and where the information should be made available. The main suggestions were for information to be provided in a variety of ways including online, hard copy, video, mobile app and face to face.

A small number suggested a one-stop-shop where all information could be accessed.

There were also suggestions for a telephone hotline, information provision in Student Advice Centres or other face to face provision.

A small number suggested information should be provided alongside course information.

A small number suggested that information on student funding should be provided in schools.

48 respondents answered the second part of the question: 'Would a particular format be more helpful?'

Again, face to face provision was seen as important in order to provide tailored advice and information; telephone provision was also seen as useful in this regard. Other formats suggested by respondents included:

- Videos (with subtitles and in BSL).
- Online information; an interactive online resource.
- Printed (including braille) or audio learning needs supported material.
- A funding app.
- Presentations and information days.
- More picture / diagrams / infographics.
- Leaflets.
- Questionnaires that can determine eligibility.
- Quiz or cartoon style.
- Available on memory sticks for those without access to internet / poor internet.
- Posters in colleges and schools.

# Question 3.3: When should potential students first be given information on financial packages of student support?

76 respondents commented at this question and the main suggestion, from many respondents across respondent groups, was for potential students to be given the information at the pre-application stage. Respondents said this could be given out along with the prospectus or when an enquiry is made to a college of university.

Smaller numbers made other suggestions including:

- When pupils or students start to think about their next steps.
- With a course offer or when an offer is accepted.
- As early as possible.
- That the information should be accessible at all times.
- At open days.

There were also comments on the need to make potential students aware of UCAS and SAAS at an early stage.

Several respondents, from various groups, commented on the need for education on student finances to begin in school; suggestions ranged from primary school to S5/S6.

# Question 3.4: What role should colleges / universities/ schools play in providing information on student support?

There were comments on this subject in 74 responses.

A small number of themes emerged from across respondent groups and these related to the need for clear and up to date information on funding streams, how to apply and timelines. One college respondent commented that the information available from the SAAS and other agencies is often complex and technical; they suggested that colleges and universities could provide clearer information or interpretation for students.

Several respondents suggested workshops or other support for completing funding applications.

Comments on the need for one to one (and face to face) advice were also noted in several responses.

Other comments included a variety of suggestions, each from very small numbers of respondents:

- Money management support.
- Provision of full information, including impact on benefits.
- Signposting to information.
- Provision of relevant information for vulnerable groups.
- Course pages on college and university websites should include information about tuition fees and funding.
- Information on emergency / discretionary funding.
- The need for well-trained, knowledgeable advisors.

Comments specifically relating to schools included the need for (better) information on student funding to be provided in schools; that schools could invite representatives from colleges and universities to explain funding to pupils; and the need for a joined-up approach; for consistency of information provided by schools, colleges and universities.

### Question 3.5: What more could be done to support parents/guardians to better understand the student support funding available?

66 respondents commented and the main suggestion, from across respondent groups, was for information to be provided through schools, including at parent evenings, via Parent Teacher groups, or at school information sessions. Other suggested routes included via the National Parent Forum, through colleges, or at family centres. The need to involve both students and parents was stressed and joint information sessions for students to attend with their parents were also suggested.

Several respondents said that information needs to be provided in a variety of formats. Pamphlets, leaflets and information packs were most frequently mentioned and respondents also suggested a parent information portal or specific pages for parents on websites such as the SAAS. A helpline, online videos, an online spreadsheet and FAQs on the SAAS website were also mentioned, while one college respondent said that permission from students at one college allowing funding information to go to parents had proved popular.

Respondents stressed the need for clear, concise and consistent information. There were also calls for information to be simple and straightforward, with comments that some parents may not have experienced the further or higher education system or may not have an understanding of the types of finance involved.

A small number made suggestions for specific information that, they felt, would be useful to parents. The main suggestion was for information on how funding interacts with benefits. Other suggestions included more information on expectations on parents or parent responsibilities or information on funding for disabled students.

A small number, from the college group commented that standardised systems or categories would make student funding easier for parents to understand.

There was also a call for information to be provided earlier than at present.

## Question 3.6: What could be done to help students understand more about student loans, including how and when they are repaid?

71 respondents made suggestions and the main theme, from across groups, was the need for clear, concise, accurate and jargon-free information.

Many of these respondents wanted to see information include examples of repayment levels in chart or table form.

There were calls for information to be provided in a variety of formats including leaflets, social media, phone apps and online.

Respondents wanted to see real students giving their own experiences on YouTube and resources developed by students for students.

Other suggestions included:

- An online calculator to allow students to estimate their repayments.
- A telephone hotline.
- Signposting to, or use of good existing resources available, for example on mygov.scot, Money Saving Expert.com or the Open University's 'You and Your Money'.
- Clear information on what student loans actually are, how they work and myth busting information.

Commenting on the information available through the SAAS, some respondents said that the website is confusing and that it needs to be easier to find information. There were also comments that the SAAS information should have less jargon (eg mention of Retail Price Indexes, interest rates and percentage of repayments) and should include practical examples. Respondents wanted to see easier access to 'real' people to ask advice; there was a comment that telephone waiting times are very long.

Similar comments were made about the Student Loans Company; a college respondent said that "the Student Loan Company could improve the way they interact with their customers, and make their approaches and information for students more customerfocused and friendly".

A respondent from the inclusion group commented: "On the Student Loans Company website, you have to click on five different links before you can find out any information about repayment and the website itself is incredibly complex with vast amounts of

*information*". There was also a suggestion that the 'what you will pay and when' section of annual statements could be tailored to individuals.

Respondents suggested various ways in which information on funding could be provided to students and prospective students, a main theme was the need for financial education to start in schools and to continue throughout a student's education. The need for clear Information to be provided at the time of applying for a course was also stressed. Suggestions for financial education provision included:

- Via SAAS workshops in schools and colleges.
- Via Student Associations.
- In schools and colleges; and the need for school and college staff to have training in order to provide information.

# Further consideration of the levels of funding required

#### **Summary:**

Most respondents felt that a 'minimum income' guarantee should be introduced across all students.

- This could be linked to the Living Wage; several specified this should be the Scottish Living Wage.
- It should apply to all students; there were also comments on the need for some form of top-up funding for any groups of students that might need additional support.
- Few gave an indication of a specific balance of bursary / loans within a 'minimum income'; most reiterated that it should depend on circumstances or need.

There were again concerns over any increase in the use of loans. When asked if all students should have the option to access student loans, regardless of their level of study at college or university, there was a mixed response, although more were in favour than were against. However, within the college and student representation groups more were against this idea than supported it.

When asked about student loan terms and conditions, a main theme to emerge was the need to consider an increase in the repayment threshold.

Section 4 looked at minimum income levels and access to student loans.

### Question 4.1: Should a 'minimum income' guarantee be introduced across all students?

As can be seen in the table below, 60 respondents said yes, 11 said no, 12 made other comments and the remainder did not reply.

Question 4.1

	Student Representation (17)	Inclusion (11)	Colleges (9)	Universities (7)	Unions (staff)	Other (5)	Individuals (46)	TOTAL (98)
	(17)	(11)	(3)	(*)	(0)	(0)	(40)	(30)
Yes	9	7	7	6	-	2	29	60
No	1	-	-	-	-	-	10	11
Other comment	4	1	2	1	1	2	1	12
No reply	3	3	-	-	2	1	6	15

#### In favour of a minimum income quarantee

Looking first at those who said **yes**, a variety of comments emerged from responses including:

- The need to ensure circumstances are taken into account, as a minimum income suitable for one student may not be suitable for another.
- That specific circumstances should be taken into account; for example if the student is a carer or has a disability they may require additional income to help with transport or other expenses.
- The need to avoid any increase in debt, or debt for FE students.
- That access to student jobs varies across the country or that some students may struggle because of disability to access work; and so the minimum guarantee should not be linked to work.
- The need for a sliding scale of bursaries to loans based on need.
- That a guaranteed income would be of benefit to those estranged from parents;
   especially if this is difficult to evidence.
- That this should be linked to attendance.
- That this would help simplify the system; conversely that this would be complex to administer.
- That this would help encourage financial independence.
- That this could help retain students who may otherwise drop out due to financial pressures.
- That the minimum income should be calculated on the Scottish Living Wage.
- That the cost of living in rural areas should be taken into account.

#### Not supportive of a minimum income guarantee

Amongst those who said **no**, the student representation respondent said they could not support this without first knowing what this would entail; whether it would be a loan or a bursary. They commented that they do not support a move towards all students accessing loans. Similar comments were also seen amongst those who did not give a yes or no response.

The main theme from individuals that commented, all of whom were either studying at university or employed in an education institution, was that circumstances should be taken into account. These would include parental contributions, other student income or access to income, that there should be a needs-based assessment. Again, similar comments were seen amongst those who did not give a yes or no response.

There was also a concern over students potentially losing access to DWP benefits.

#### Other comments relating to a minimum income guarantee

Other comments included, as mentioned above, that more detail is required as to what a minimum income guarantee would involve.

Other comments included an inclusion group who wanted to see additional resources for those with additional support needs. Two student representation respondents pointed out that some students' personal circumstances limit the amount of employment they can undertake, for example those with caring responsibilities or disabilities.

A university respondent suggested that study intensity should also be considered.

A respondent from the 'other' group commented that there is already a minimum income guarantee for HE students and that this should be extended to FE students. They also favoured student support calculated on the Scottish Living Wage "with students from the poorest households having more of their student support award in bursary form". A respondent from a college also commented that this exists within the HE funding system and allows students to make a decision about whether they can afford to study.

Further comments included: the need for support to be based on the cost of living for all students; concern that a mix of grants and loans could lead to larger debt for some or, in some cases, students who do not require the support accessing low cost loans for other purposes; and the need to ensure that any funding system does not pose a barrier to lower income students accessing education.

# Question 4.2: What should the 'minimum income' guarantee be, and why? Should it be linked to the Living Wage?

72 respondents, across groups, commented on this question and there were various different suggestions.

An inclusion respondent felt this should be based on, for example, the Centre for Research in Social Policy's minimum income calculator. They also commented that the system must acknowledge that not all students are able to undertake paid work.

One college respondent commented on the need for the same maximum to apply to both FE and HE students. Another from this group had questions about how this would work given the different hours and weeks for different courses. They suggested that amending the current system might prove easier and more equitable than a wholesale change. As an alternative, they suggested that the living rate could be paid by colleges (as a bursary not a loan) while other payments could be made through the benefits system or local authorities.

One student representation respondent suggested a 100% bursary based on need. Another student representation respondent felt the calculation should be based on a 25 hour study week while another suggested that preparation, research and writing time needed to be added to study hours.

A university respondent wanted to see a minimum income that would relieve any financial stress; they commented on the need for support for Open University students to travel, to finance childcare or to purchase technology or equipment. They also commented on the need to "protect students in unstable or self-employment for whom income is unpredictable".

Several individuals commented and all gave different suggestions. These included:

- Basing the level on a Research Training Council recommended stipend, taking into account any parental support.
- £4,000 (because this is just below the minimum amount of student loan available).
- Covering the basic cost of living.
- Based on current income support levels.
- Based on income support plus rent.

- Based on benefit levels with any additional support required to meet the costs of studying.
- That students earnings should be taken into account.
- That it should depend on the course / hours and should include accommodation, food costs and materials.
- Based on a national average cost of living with any increase required for regional variations.

Two individuals commented that the question implied they had said yes to a minimum guarantee, which they had not.

#### **Living Wage**

Not all respondents commented on whether a minimum income should be linked to the Living Wage. Of those that did: 36, from across respondent groups, stated that it should be linked.

However several of these respondents included provisos and suggestions, the main one being that the Scottish Living Wage should be used.

Other comments included:

- That this should be for full-time students.
- Concern over impact on benefits.
- The need to take into account other factors such as whether the student has dependents.
- That this would be a start, but that other income and savings should be taken into account.
- The need to calculate income over 12 months rather than the 31 week academic year.
- That this would be a good baseline for measuring any need for changes to funding levels over time.

Only 7 respondents, mainly individuals with a small number of colleges, said they did not support a link to the Living Wage. Reasons given included:

- That the Living Wage should be related to work not study; that students should be encouraged to work.
- That this would not be practical and that it would negatively impact upon students in receipt of benefits.
- That funding should be linked to the cost of studying.
- That benefits do not match the Living Wage.

A small number of respondents, from the college and student representation groups, felt that the minimum should be a proportion of the Living Wage.

Seven other respondents, mainly individuals and one from the student representation group, made other comments relating to a link with the Living Wage. These included:

 The need to take into account whether the student can work as well as study (student nurses were cited as one group where this is not possible).

- That the Living Wage for under 24 year olds is lower than for older people.
- That setting the minimum at too high a level may encourage people to study (rather than work) for the wrong reasons.
- The need to take holiday periods into account to ensure students do not accumulate additional debt over these periods.
- A query as to whether a student should be paid more than an apprentice.

#### Question 4.3: Under what circumstances should a 'minimum income' apply?

64 respondents, from across groups, addressed this question and again a wide range of different suggestions were made.

The main theme, emerging across respondent groups, was for the minimum to apply to all students. Several of these respondents also specified groups where additional support, perhaps in the form of top-up funding or access to loans, should be provided. These included care experienced students, carers, students from protected groups, independent students with no family support and those from lower income households or disadvantaged backgrounds.

A small number who said the minimum should apply to all students also said there should be other criteria taken into account such as the length of course, whether full or part time or postgraduate, whether other support is available, whether study hours allow the student to work as well.

A small number said that the minimum income should be based on need. Two respondents from the college group suggested that this could be based on the current rules for HE students.

There was a suggestion, from one of the college group, for setting a family or household income threshold, although another from this group felt that all students should receive a minimum regardless of parental income.

A small number of individuals and a respondent from the university group also suggested setting a minimum level of household or parental income. Two respondents from the university group, however, commented that the current level may need to be raised, one said: "Students whose family incomes are at, or above £34,000 can be the hardest hit as this figure is not hugely higher than the national average wage. Perhaps another higher limit to could be introduced in that household incomes over, for example, £50,000+".

Other comments, from a small number, included different – and differing - suggestions as to whether the minimum should be in the form of loans or bursaries; although bursaries were preferred to loans by most of those who made these suggestions.

A small number said that the minimum should be applied as soon as funding is applied for.

### Question 4.4: What is the appropriate balance of bursary / loans within a 'minimum income'?

Few of the 62 respondents that commented gave an indication of a specific balance, with most reiterating that it should depend on circumstances or need. Several suggested some form of sliding scale depending on need or household income.

Several supported a move towards a bursary-only scheme, although there was some acknowledgement of the financial difficulties around this.

There were again concerns over the introduction of loans for FE students or any increase in the use of loans, which some described as acting as a barrier to entering study. One college respondent said: "Other options should be explored before any proposals are put to the Scottish Government suggesting student loans in the FE sector".

Of those that did suggest a balance but did not specify proportions, several said the balance should be more bursary than loan; a small number of individuals suggested the loan proportion should be higher than the bursary while one individual said there should be no bursaries.

Specific suggestions included:

- 50/50 or up to 50/50 from a 100% bursary (individuals and university respondents).
- No more than 50% loan but ideally no loan (college).
- 75% loan, 25% bursary (individuals).
- One third bursary to two thirds loan. (university and student representation).

# Question 4.5: Rather than only Higher Education students, should all students have the option to access student loans, regardless of their level of study at college or university (in addition to existing bursary entitlement)?

There was a mixed response from the 74 respondents who replied to this question although more were in favour than were against access to student loans for all students and this was the case within most of the respondent groups. Overall, almost half of those who replied voiced support while around a third voiced their opposition.

Looking at the different respondent groups shows that it is only within the college and student representation groups that opposition outweighed support for this option.

The main theme to emerge amongst those who were **supportive** was that loans should be available for all students.

Respondents again raised similar concerns or provisos to those seen at the earlier questions in this section, in brief:

- That loans should be available alongside bursaries.
- Concern over debt levels.

There were also comments on: the need for low interest rates; and for clear information for students as to the financial implications;

Looking at those who were **against** access to student loans for all students shows the main reasons given were

- Concern over the impact this may have on benefits or bursaries.
- Concern over the increased level of debt in general.
- Concern over the level of debt for FE students who progress to HE.
- That 16 to 18 year olds may not have the level of financial maturity required to decide.
- That loans are a barrier to accessing education.

From within the college group of respondents there was again a view that loans are not suitable for FE students, for example: "FE learners would merely increase their debt and given likely employment destinations, most debt would be written off against lower salary levels in future". Only one from this group said yes to this question.

Question 4.6: Are there ways that the terms and conditions attached to student loans (e.g. interest rate or repayment threshold) could be reviewed to support consideration of extension to all students?

63 respondents answered, although 5 simply said 'no' and one said 'yes' but gave no further details. A further 7, from various groups, reiterated their opposition to student loans, especially for FE students.

One main theme to emerge from those who made suggestions was the need to reconsider the **repayment threshold**. Several of the respondents, particularly individuals and those from the student representation and university groups, wanted to see this increased and suggestions included raising the threshold in line with other countries in the UK or in line with the Scottish graduate starting salary.

A very small number of individuals, however, felt that the threshold should be lowered to recoup funds more quickly.

Other comments in relation to thresholds, mainly from individuals, included:

- That there needs to be acknowledgement that some students will never reach the minimum threshold.
- That there should be no threshold but that repayment should begin with employment.
- The need for more information for students on thresholds.
- That any repayment threshold for FE students should be the same as that for HE students.
- That the current threshold and repayments are fair.
- That loan debts should never be written off.
- That earnings are not always equal to ability to pay.
- That some part-time students may already be earning over the threshold.
- That early repayment should be allowed if student wishes.

Another main theme related to **interest rates**. While a small number, from various groups, felt loans should be interest free, others made a variety of suggestions including:

- The rate should be maximum 1% above bank base rate.
- There should be a guaranteed interest rate for the life of the loan.
- Rate should be more favourable than commercial loans.
- Rate should not exceed mortgage interest rates and should drop when rates drop.
- Rate should be competitive and transparent.
- Should be matched to base rate and change in line with inflation.

Other comments made at this question raised concerns or included other suggestions.

An inclusion group that commented on the need to consider any "changes to repayment or interest rates in relation to observant Muslims, Sharia and loans" in order to ensure loans are suitable.

A student representation respondent suggested that increased income tax rather than higher interest rates, should be used to fund student support. Another from the same group suggested that all loans for a student should be linked rather than separate.

A small number called for any debt accrued during FE to be written off for those students progressing to HE.

A respondent from the 'other' group wanted to see student loans excluded from the credit application.

### Other comments

In the final question, respondents were invited to share any other comments, ideas or suggestions.

Question 5.1: Please use this space to provide any other comments which you believe are relevant to the review. In addition, your ideas and innovative suggestions are welcomed to help inform our final report on how the student support system can be fit for the future.

69 respondents added other comments when invited to do so. Many of these comments summarised or reiterated the main points made by the respondent in their submission while some respondents provided back ground information and others welcomed the chance to take part in the consultation.

Additional points made in this section included:

Comments from college respondents on the need for additional investment in education. There were also comments from within this group that colleges should manage and administer their student applications locally. One respondent from this group voiced concern that there is currently no way to check whether a student has applied to or had funding from another college. Another from this group cautioned that any move to loan based funding for FE students "could disproportionately disadvantage older students who make up more than 25% of our cohort".

A respondent from the inclusion group commented on the need to ensure funding is suitable for observant Muslims:

"Different potential models from Islamic Finance have been considered and the Takaful (Islamic mutual insurance) model has identified as the one most likely to allow the UK Government to meet its aims. The Scottish Government should engage with the UK Government to better understand how they have approached alternative student finance and ascertain what conclusions can be drawn to help inform policy, legislation and delivery in Scotland".

A respondent from the 'other' group made several comments including that an increase in the student support budget will need to be funded through new money and not through any reduction in core funding for the FE sector. They also commented on the different financial system that Scottish universities operate within and on the need to consider how the funds used to pay EU student tuition could be used following Brexit. Another from the same group also mentioned the need to look at the implications of Brexit.

This respondent also suggested that "the working group to consider commissioning research into the implications of potential changes to the system of student support".

A student representation body commented on the need to consider the support available to EU and international students. This respondent also said that students on maternity or paternity leave require support. They recommended: "that all universities and colleges have policies regarding maternity and family leave".

Two student representation bodies commented on the need to give consideration to Apprentice students as part of the Review.

One of these respondents also mentioned the large rises in rents seen in the private rented sector and wanted the Review to look at whether there are measures that could be taken to ensure any rise in student income did not go straight to landlords due to increased rent. This respondent suggested that colleges and universities should be encouraged to "to look at how they use capital funding to build not for profit, sustainable student accommodation, which would be run to provide a service to students, not for the interest of private profit".

The other student representation body said they wanted to see separate FE and HE Discretionary funds replaced with a single Discretionary fund.

Two respondents from this group felt that the Education Maintenance Allowance (EMA) should be discontinued as it is no longer suitable.

A university group respondent stressed the need to ensure that higher education is accessible for all. They also commented that the SG should consider "investing in an appropriate and empowering financial literacy strategy with key stakeholders".

One college respondent commented on the Review itself in a series of concerns and queries, including: "These consultations questions suggest that the review is primarily based on what's wrong within further education funding and not higher education. There has been no consideration to the problems with higher education and student loans".

There were a large number of comments from individuals and these included:

- That there will either need to be increased taxes to pay for education, the cost will have to be borne by FE and HE graduates or that places will need to be cut.
- The need for a tiered approach to funding based on circumstances and need.
- That funding champions could visit schools, career events etc.
- That there could be a funding app for potential students to access.
- The need to consider travel costs within the Review.
- The need for access to emergency funds or top-up loans to avoid the use of payday loans.
- The need to consider differing costs of living in different areas.
- The need for more money from the SG for student funding.
- That individual institutions are best placed to manage student funding and meet the needs of their students.
- The need for a consistent approach across colleges to FE funding.
- The need for any new scheme to be clearly communicated with training for those involved in its administration.
- That the Review should look at the German system of education funding.
- Criticism of the timescale of the consultation (during the holiday period).
- The need for Scottish students studying in English universities to be treated equally with those studying in Scotland.
- That some students are able to access loans they do not require, while others who
  require loans cannot access them.

- A suggestion that parents could defer child allowance into a savings plan to help pay for further or higher education costs.
- That funding should be based on effort rather than need or level of study.
- The need to reinstate the additional living cost allowance for those studying in London.
- That there could be debt write-offs for repeat years.
- The potential benefits of Credit Unions.
- The possible use of Credit Unions within the funding system.

# **Appendix: Respondent organisations**

Respondent organisations
Ayrshire College
Ayrshire College - Student Funding Team
Ayrshire College Student Association
Border Carers Centre
British Dental Association
CELCIS
Child Poverty Action Group in Scotland
Colleges Scotland
Dundee & Angus College Students' Association
Edinburgh College Students' Association
Equality Challenge Unit
Fife College & Fife College Students' Association
Forth Valley College
FourSquare (Scotland)
Glasgow University Students' Representative Council
Highlands and Islands Students' Association
Lead Scotland
National Deaf Children's Society
Perth College UHI
Scottish Childminding Association
SRUC Students' Association
Stand Alone
The Educational Institute of Scotland

The National Union of Students Scotland
The Open University
The Royal Society of Edinburgh
The University of the Highlands and Islands
UCU Scotland (The University and College Union)
UNISON Scotland
University of Strathclyde Students' Association
23 organisations - name withheld
46 individuals