# Postgraduate Masters support for the 2024/25 academic year

# Section 1. What action is the Welsh Government considering and why?

## **Proposal**

To make changes to postgraduate Master's (PGM) support as set out below:

- **Increase** the maximum amount of support by RPIX from £18,770 to £18,950, by increasing the amount of loan. This is in line with established policy.
- **Remove** the base and contribution-to-costs grants from the PGM support package; and replace the difference with loan.

These changes will apply to new students only; those starting courses on or after 1 August 2024.

## **Background**

Student support regulations, made under section 22 of the Teaching and Higher Education Act 1998, underpin the system of financial support for eligible students who are ordinarily resident in Wales and certain other students who study in Wales.

For undergraduate study, and for some postgraduate study, support for living costs is a mixture of loans and grants, equivalent to the National Living Wage, with the highest level of grant directed towards those most in need. Every eligible student is guaranteed a minimum level of maintenance support which varies only with the location of study.

For PGM study and postgraduate Doctoral study, a contribution to costs support package is available to support students from all backgrounds. For PGM students only, the contribution-to-costs package (up to a maximum of £18,770 for AY 2023/24) consists of:

- a 'base' grant of £1,000 available to all eligible PGM students;
- an additional means tested 'contribution-to-costs' grant of up to £5,885; and
- a loan to make-up the difference between the two grants and the total amount of support.

PGM support in Wales and across the UK

The Welsh Government provide a generous PGM contribution-to-costs support package compared to the other UK nations. The following table sets out the PGM support available across the UK for 2023/24:

	Wales	England	Scotland	NI
Maximum support available	£18,770 Single rate of support for each student.	£12,167 Single rate of support for each student.	Tuition fee loan of up to £7,000 (split equally across each year of study) Living Cost Loan of up to £4,500	Tuition Fee Loan of up to £6,500 (split equally across each year of study).
Maximum contribution-to-costs grant	Means tested up to £5,885 Non means tested base grant of £1,000	Not available	Not available	Not available
Maximum contribution-to-costs loan	Up to £17,770, depending upon amount of grant.	Up to £12,167	Living Cost Loan for full-time study only of up to £4,500	Not available

#### PGM support for 2024/25

Changes to PGM support for the 2024/25 academic year have been considered against a backdrop of sustained inflationary pressures impacting the cost of living for students and the need to restructure budgets for Welsh Government, in light of significant budgetary pressures. The contribution-to-costs and base grants will be replaced by repayable student loans. This will apply to new students in 2024/25. The maximum amount of support will increase by 0.9%, in line with existing policy.

# Five ways of working

We consider the support available to PGM students from 1 August 2024 to be consistent with the five ways of working:

## Long term

The Welsh Government is committed to ensuring an affordable and sustainable student finance system for Wales. Despite significant budget constraints this year, proposed changes to PGM support will ensure Welsh students continue to be fully supported to access postgraduate education and protected from sustained cost-of-living pressures.

#### **Prevention**

Replacement of grant with loan ensures upfront financial support for postgraduate study is maintained at a generous level, while the provision of loan only funding mirrors support in other parts of the UK. Whilst student debt will likely increase as a result, repayment of student loans is income contingent. It is not based on the size of the loan but rather on the amount the student earns above a certain threshold. The progressive nature of repayment policy mitigates against the impact of increased debt as a result of this change.

#### Integration

Supporting students to access higher education, supports the aims of the Programme for Government and the goals of the Well-being of Future Generations (Wales) Act 2015. Provision of PGM support contributes to the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015, specifically:

- a prosperous Wales (a skilled and well educated population);
- a more equal Wales (enabling people to fulfil their potential); and
- a Wales of vibrant culture and thriving Welsh language.

#### Collaboration and involvement

All key partners involved in the delivery of higher education or supporting students to access higher education are engaged in the provision of student finance in Wales. Key stakeholders include, but are not limited to, the Higher Education Funding Council for Wales, Universities Wales, Colegau Cymru, higher education providers, NUS Wales and the Student Loans Company. They have been vital in reflecting the ongoing needs of the higher education sector and the needs of students.

## **Costs and savings**

In response to budgetary pressures, the Student Supports Grants BEL for 2024/25 financial year has been reduced by £63.533m. This reduction includes £53.933m relating to Student Support Grants and £9.6m relating to the removal of Post Graduate Grants.

The total costs arising from removing the grant entitlement from PGM support, replacing the difference with loan and increasing the overall support rate in line with established policy are set out below.

Total costs				
	Total costs for the 2024/25 academic	Total costs	split by financial year	
	year	FY 2024/25	FY 2025/26	
Near Cash	£5.0m	£3.3m	£1.7m	

AME	£83.5m	£55.1m	£28.4m
Non Cash (RAB)	£0.0m	£0.0m	£0.0m
Total	£88.5m	£58.4m	£30.1m

# **Mechanism**

The Education (Student Support) (Postgraduate Master's Degrees) (Wales) (Amendment) Regulations 2024 make changes to PGM support as identified above and apply to courses beginning on or after 1 August 2024.

A Regulatory Impact Assessment has been completed for the Education (Student Support) (Postgraduate Master's Degrees) (Wales) (Amendment) Regulations 2024.

# **Section 8. Conclusion**

# 8.1 How have people most likely to be affected by the proposal been involved in developing it?

There is no statutory requirement to consult on student support regulations and no consultation has been undertaken in relation to changes to support for postgraduate Master's study. The proposal has been discussed with a number of key stakeholders including Universities Wales and representatives of the sector.

Removal of the contribution to costs and base grants has been prompted by significant pressures to Welsh Government budgets for the 2024/25 financial year. The change is being introduced ahead of the 2024/25 academic year because of the particular pressures on this year's budget.

The increase to the maximum amount of support (0.9% for 2024/25) is in line with established policy.

#### 8.2 What are the most significant impacts, positive and negative?

The student support system in Wales supports the goals of the Well-being of Future Generations (Wales) Act 2015, particularly those goals of 'a prosperous Wales' and 'a more equal Wales'. It also meets objectives within the 'learning' themes in the Prosperity for All strategy, in particular 'support young people to make the most of their potential'. The changes to postgraduate Master's support does not alter this. Support for undergraduate study is unaffected as the Welsh Government continues to prioritise support for those undertaking their first higher education qualification.

There is no impact on continuing students. Postgraduate Master's support is an 'apply once' product; support is per course not, as is the case for undergraduate support, per academic year. Students must make an application for support no later than the end of the ninth month of the final academic year of the course and so applications from those who commence a course prior to 1 August 2024 may be received for some years yet. These continuing students will be anchored to the relevant provisions in the Education (Student Support) (Postgraduate Master's Degrees) (Wales) Regulations 2019 and will remain eligible for grants.

The change will impact all new students commencing a course in the 2024/25 academic year. Other than Disabled Students Grants, no grants will be offered to postgraduate Master's students. Compared to existing policy, a student will lose a minimum of £1,000 and a maximum of £6,885 in grant assistance but can apply for an increased loan. Therefore, a student's debt is likely to increase. The repayment of student loans, including that for postgraduate study, is income contingent: students pay a fixed proportion of their income (6% in the case of postgraduate loans) over a threshold amount of income (currently £21,000 per year).

The impact of removing the means tested grant will not be experienced equally. The principal impact is on those from low-income households via the removal of grants. By extension, some of those with protected characteristics who may typically have low incomes will also be affected.

The changes to PGM will have a potential impact on the following groups:

- students from low-income households;
- students from black and ethnic minority communities;
- students with a disability;
- students with children/caring responsibilities;
- · female students; and
- student care leavers (under the age of 25 on the first day of the first academic year).

The numbers of postgraduate Master's students with protected characteristics is not known as there are no relevant statistics. However, there is a projected total of 6,622 funded postgraduate Master's students in 2024/25. Of these, 2,518 will be new students. All new students will be impacted though the removal of the base grant, and a subset by the removal of the contribution to costs grant.

#### 8.3 In light of the impacts identified, how will the proposal:

- maximise contribution to our well-being objectives and the seven well-being goals; and/or,
- · avoid, reduce or mitigate any negative impacts?

In general terms, higher education makes a major contribution toward one of the five calls to action in the 'Prosperity for All: Economic Action Plan', namely 'High Quality Employment, Skills Development and Fair Work'. Having a skilled workforce is necessary to successfully develop the Welsh economy. Graduates are a critical part of that workforce. The Welsh Government continues to prioritise support for those undertaking their first higher education qualification as this has the greatest economic and social impact.

Continuing to provide postgraduate Master's contribution to costs support to help students to meet fees and living expenses will enable students from all backgrounds to pursue a postgraduate education and invest in their own future.

Replacing grant with loan rather than removing it ensures that the Welsh Government continues to support new postgraduate Masters students with the challenges of cost-of-living and protects them from the difficulties faced with current inflationary pressures.

Any negative income impact will not be experienced by PGM students in the short-term but in the longer-term as the maximum support value available is not affected by the removal of the grant entitlement, only the loan value to be repaid will change significantly. This means

student debt will likely increase. Students can choose how much loan they receive up to the maximum support value in making their decisions on investing in a postgraduate education.

The repayment of loans is income contingent. This means an increase in student debt does not directly result in an increase in repayments. PGM students repay 6% of their income above a specified threshold. The repayment amount does not increase unless the borrower's income increases. Those with lower incomes pay back less than those on higher incomes. The progressive nature of repayment policy mitigates against the impact of increased debt as a result of this change.

# 8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

Ongoing monitoring of student support, including changes to postgraduate Master's support, will continue via Welsh Government's internal Student Support Forecasting User Group, which meets at least quarterly.

All student support arrangements are reviewed on an annual basis and regulations are updated accordingly, as and when required.

# **Equality Impact Assessment**

# Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

#### Proposed policy change

Budget pressures have prompted a policy review of student support uplifts for 2024/25 academic year and various options and their financial, policy, and delivery implications have been considered. As a result, the following changes to student support will take place for the 2024/25 academic year:

- Increase undergraduate and doctoral student support in line with established policy;
   and
- Remove the base and contribution-to-costs grants from the postgraduate Master's ('PGM') support package in order to realise savings; and mitigating the difference with loan. The maximum support value will be increased in line with established policy.

Increasing student support rates is based on long established policy and no impact assessment is required for this option.

This EIA focuses on the impact to students of removing the grant entitlement from PGM support, which is a change to existing policy. This policy change will mean Welsh Government cease to offer the two grants and to completely replace with additional loan for new students. Other than Disabled Students Grants, no grants will be offered to PGM students. A similar policy is operated in England.

Regulatory changes will be required to enable the policy change to be implemented. Regulations are expected to be made by Welsh Ministers in April 2024. This policy change will then be applicable to those commencing a PGM course on after 01 August 2024.

## Impact analysis, data availability and modelling

Assessing the equality impacts in respect of removing grant entitlement to PGM support rates is difficult. Quantitative modelling of the impact is not possible as the availability of data is limited.

However, there is contemporary research available on the differing impacts arising from cost-of-living pressures on the population across the UK. Some available research is specific to the impact on students, i.e., student surveys, whilst most research is generalised on the impact to households across the UK population. The findings from research have been used as part of this EIA as evidence to demonstrate what impact removing grant entitlement may have on those with protected characteristics.

#### **Impact**

#### General

There is no impact on continuing students. There are forecast to be 6,622 Welsh domiciled students undertaking a PGM course and funded by Welsh Ministers for the 2024/25 academic year, of these 4,104 are continuing students. PGM support is an 'apply once' product; support is per course not, as is the case for undergraduate support, per academic year. Students must make an application for support no later than the end of the ninth month of the final academic year of the course and so applications from those who commence a course prior to 1 August 2024 may be received for some years yet (PGM courses can be undertaken up to two years (full-time) or up to four years (part-time), but support as a continuing student will cease if the PGM course cannot be completed within the stated timeframes). However, continuing students will remain eligible for grants as PGM support is anchored to when they commenced the course not when they submit an application for support.

Previous PGM students have benefited from the same maximum support value, albeit this may have included a grant / loan split. All new Welsh students on PGM courses commencing on or after 1 August 2024 will no longer have access to grant but will continue to benefit from the same maximum level of overall support. See table below:

	Courses commencing before 01 August 2024	Courses commencing after 01 August 2024
Maximum level of support for PGM courses	£18,770 Single rate of support for each student.	£18,950 Single rate of support for each student.
Contribution-to-cost grant	Up to £5,885 (means tested)	N/A
Base Grant	£1,000 (non means tested)	N/A
Maximum maintenance loan	Up to £17,770, depending upon amount of grant.	Up to £18,950

Uplifting the maximum level of support by RPIX, in line with established policy, benefits all PGM students. PGM support was uplifted by 1.8% for courses commencing on or after 1 August 2023; this was in line with the estimates of forecasts for the year to Q1 2024 as

published by the OBR in March 2022. For courses commencing on or after 1 August 2024, PGM support will be increased by 0.9% in line with estimates of forecasts for the year to Q1 2025.

Policy is one of reflecting inflationary changes to goods and services from year to year in the value of support; this is especially important for students at a time when they are continuing to experience increased cost of living pressures.

There is a risk that by removing grants and increasing loans (and so increasing the cost of PGM study for many students) will deter some prospective students from undertaking a course of postgraduate study – a disincentive effect. Enrolment data form 2021/22 academic year identifies key groups that could potentially be disincentivised, these include disabled students (19% of PGM enrolments), Black, Asian and Minority Ethnic people (9% of PGM enrolments), women (63% of enrolments). Potential students from low-income households could also be deterred. It is not possible to quantify this disincentive effect. However, the mitigation of replacing grants with loans will mean that new students will not experience any loss of in-study income compared to previous cohorts, minimising the disincentive effect. In addition, a mitigation of Welsh policy in respect of PGM support more generally, is that Welsh Ministers provide a significantly more generous support value to students compared to their peers in England (for the 23/24 academic year, students in England could only access a maximum support value of £12,167; UK Government do not provide grant as part of their PGM support package). This may also minimise the disincentive effect.

#### Removal of the base grant and contribution-to-costs grant

There are projected to be 2,518 new students for the 2024/25 academic year. Removing the base grant (£1,000) from the PGM support package for courses commencing on or after 1 August 2024 impacts all new students. Mitigating the difference through additional loan, offsets this reduction in support that would otherwise be faced by new students. However, it does mean that all students commencing a PGM course on or after 1 August 2024 are likely to have to repay a higher loan value compared to students who commenced a PGM course the previous year. A student need not take out the maximum loan; it is possible some students may choose a smaller loan in the absence of grant support.

Students who commenced a PGM course in the 2023/24 academic year were entitled to a contribution-to-costs grant of up to £5,885 depending on their **household income**. The remainder of the support was then topped up by a loan amount up to the maximum support value (£18,770). The calculation of household income only determines the student's loan/grant split, rather than the maximum support value available. For students on PGM courses commencing on or after 1 August 2024, the contribution-to-costs grant will no longer be available. The amount of support will not fall: students will still be entitled to the maximum total support amount as the removal of grants will be mitigated through additional loan instead.

Data provided by the Student Loans Company showed there were 4,135 students who received the contribution-to-costs grant in the 2022/23 academic year.

PGM students from low-income households commencing a course on or after 1 August 2024 will have to repay a higher loan value compared to students from low-income households who commenced a PGM course the previous year. Additionally, as the base grant will also be removed, students from low-income households will be disproportionately impacted by the removal of grant entitlement (both base grant and contribution-to-costs grant) compared to their peers from higher income households for the forthcoming academic year (who will only experience the impact of the base grant being removed).

Female students make up the majority of students who undertake a postgraduate masters course. Trend analysis demonstrates that female students make up, on average, 66% of the student cohort. Therefore, removal of grant entitlement will likely disproportionately impact female students compared to male students. There is likely to be double impact effect here for those female students who are also from Black and Minority Ethnic backgrounds and/or low-income households.

Care leavers are a group who receive distinct treatment within student support policy. Under the Education (Student Support) (Postgraduate Master's Degrees) (Wales) Regulations 2019, care leavers are specifically made eligible for the full grant irrespective of their household income in recognition of their generally poor participation in post-compulsory education. There is insufficient data available on care leavers, but it is estimated there may be between 25 and 40 care leavers receiving the full contribution-to-costs grants each year. Therefore, the removal of grant entitlement will specifically impact these students, albeit the overall amount of support will remain the same (as described above).

The impact on those in receipt of social security benefits is very difficult to ascertain, as it will depend on a number of factors. Student support is treated as unearned income and benefits are reduced according to rules laid out in legislation. Therefore, impact may be mixed.

#### Debt burden

Any negative income impact will not be experienced by PGM students in the short-term but in the longer-term as the maximum support value available is not affected by the removal of the grant entitlement, only the loan value to be repaid will change significantly. This means student debt will likely increase however, students can choose how much loan they receive up to the maximum support value.

The repayment of loans is income contingent. This means an increase in student debt does not directly result in an increase in repayments. PGM students repay 6% of their income above a specified threshold (the **Gov.UK website** sets out further information about repayment of postgraduate masters student loans, including earnings repayment

threshold). The repayment amount does not increase unless the borrower's income increases. Those with lower incomes pay back less than those on higher incomes. The progressive nature of repayment policy mitigates against the impact of increased debt as a result of this change.

However, students who access PGM support for a course commencing on or after 1 August 2024 may take longer to repay their student loans than they otherwise would have or are more likely to continue repaying their student loan for the full duration of the loan term (30 years). This has the potential to impact on a borrower's available income in the future.

Low-income households – cost-of-living impact.

The removal of grant entitlement from PGM support will likely impact most on those from low-income households. As many of those with protected characteristics may have low incomes, it follows that there may be a disproportionate impact on certain groups. There is substantial evidence / research highlighting the significant challenges experienced by low-income households and those with protected characteristics and these have been briefly summarised in the following paragraphs.

The **National Institute for Economic and Social Research** found 'falling wages and rising bills and debt levels have hit households in the bottom half of the income distribution hardest, leading to a shortfall in their real disposable incomes by up to 17 per cent over the period 2019-2024.

The **Bevan Foundation** highlights that 15% of households are struggling to afford essential items, while a further 33% have enough for the basics but little else. Four groups are at greatest risk of financial hardship: renters; disabled people whose impairment limits them a lot; parents of children under 18; and people in receipt of Universal Credit or legacy benefits.

<u>Senedd research</u> set out inflation has slowly fallen during 2023 and it is expected to remain higher for longer. While inflation has fallen to below 5 per cent, it's not predicted to return to the Bank of England's 2 per cent target until the first half of 2025 – more than a year later than forecast in March earlier this year. The rate at which food prices are increasing (according to the <u>Office of National Statistics, Consumer Price</u> <u>Inflation report</u>) has slowed but it is still higher than the previous year.

Senedd research highlighted life is more expensive for disabled people and their families. They have to spend more on essential goods and services like heating, insurance, specialist equipment, accessible transport, specialist food and therapies. Many disabled people rely on taxis or adapted vehicles for transport, and often face higher costs for gas and electricity. Many need extra heating to keep their temperature stable, and have to use more electricity to power and charge essential items of assistive technology. Extra energy is needed for powering vital equipment such as hoists, beds,

breathing equipment, powered chairs and monitors.

<u>Senedd research</u> also identified women, particularly from Black, Asian and Minority Ethnic communities, disabled women and lone parents are more likely to be working in precarious, low paid jobs, are often juggling paid work with unpaid caring responsibilities and have lower levels of wealth and savings. These factors all leave them more vulnerable to the cost-of-living crisis.

The Runnymede Trust found that in Wales the likelihood of Black, Asian and Minority Ethnic people being in relative poverty is 3.5 times higher than white people, and that the economic gap that ethnic minority people face has widened since the 2008 financial crisis. This leaves Black, Asian and Minority Ethnic people disproportionately exposed to cost-of-living difficulties.

#### Record of Impacts by protected characteristic:

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age	Removing grant entitlement from PGM support may negatively impact all new students of any age. However, to qualify for PGM Funding, eligible students must be aged under 60 on the first day of the course.	Support available is made available to students under 60. This is the current policy for PGM support and is unchanged.  In 2021/22, there were 195 enrolments from students aged 60 or over. These were not eligible for PGM support.  The removal of grant entitlement does not affect the maximum support value available. For those who would otherwise have received a grant/loan split will instead access a loan to	Removing the grant will be mitigated by additional loan up to the maximum support value.  Increase to PGM maximum support value in line with established policy will mitigate for the inflationary changes to costs of goods and services.  Repayments policy mitigates against the impact of increased debt.  No further mitigations are available.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
		the maximum support value (in the same way as a student who did not qualify for grant previously would have).	
		PGM students commencing a course on or after 1 August 2024 will have to repay a higher loan value compared to eligible students who commenced a PGM course the previous year.	
		The removal of grant entitlement is a result of significant budgetary pressures for Welsh Government.	
Disability	Removing grant entitlement from PGM support may negatively and disproportionately impact those with this protected characteristic.  Disabled students have to spend more on essential goods and services like heating, insurance, specialist equipment, accessible transport, specialist food and therapies which have been subject to	The removal of grant entitlement does not affect the maximum support value available. For those who would otherwise have received a grant/loan split will instead access a loan to the maximum support value (in the same way as a student who did not qualify for grant previously would have).  PGM students commencing a course	Removing the grant will be mitigated by additional loan up to the maximum support value.  Increase to PGM maximum support value in line with established policy will mitigate for the inflationary changes to costs of goods and services.  Repayments policy mitigates against the impact of increased debt.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
	significant inflationary increases.  There will be a long-term impact as the increased value of loan (to mitigate for removal of grant) will impact the length of time it may take to repay the student loan (should their future earnings be above the student loan threshold).  There may an impact on participation in postgraduate Master's study from those with this protected characteristic.	on or after 1 August 2024 will have to repay a higher loan value compared to eligible students who commenced a PGM course the previous year.  The removal of grant entitlement is a result of significant budgetary pressures for Welsh Government.  19% of PGM enrolments were from students known to have one or more impairments.  Source: Welsh Government analysis of HESA student record for 2021/22	Disabled students also have access to a package of non-repayable grants made available by the Welsh Ministers. This provides for expenditure required on a non-medical personal helper, major items of specialist equipment and other relevant expenditure.  No further mitigations are available.
Gender Reassignment	It is not possible to establish whether a decision to remove grant entitlement from PGM support will have a differential impact on those with this protected characteristic.	9% of the total PGM enrolments in 2021/22 were from students whose gender identity status was not known. Of the remaining 12,925 PGM enrolments, 99% of enrolments were from students who indicated their gender identity was the same as the gender originally assigned to them at birth.	No mitigations are required.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
		Government analysis of HESA student record for 2021/22	
Pregnancy and maternity	It is not possible to establish whether a decision to remove grant entitlement from PGM support will have a differential impact on those with this protected characteristic.	There is insufficient evidence on the pregnancy or maternity situation of students to establish any general points about this population.	No mitigations are required.
Race	Removing grant entitlement from PGM support may negatively and disproportionately impact those with this protected characteristic.  There will be a long- term impact as the increased value of loan (to mitigate for removal of grant) will impact the length of time it may take to repay the student loan (should their future earnings be above the student loan threshold).  There may be an impact on participation in postgraduate Master's study from those with this protected characteristic. If	The removal of grant entitlement does not affect the maximum support value available. For those who would otherwise have received a grant/loan split will instead access a loan to the maximum support value (in the same way as a student who did not qualify for grant previously would have).  PGM students commencing a course on or after 1 August 2024 will have to repay a higher loan value compared to eligible students who commenced a PGM course the previous year.	Removing the grant will be mitigated by additional loan up to the maximum support value.  Increase to PGM maximum support value in line with established policy will mitigate for the inflationary changes to costs of goods and services.  Repayments policy mitigates against the impact of increased debt.  No further mitigations are available.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
	potential students are disincentivised this could reduce the small percentage of ethnic minority people undertaking PGM courses. This in turn could potentially limit individuals from diverse backgrounds the opportunity to become role models, mentors and leaders and inspire future generations.	The removal of grant entitlement is a result of significant budgetary pressures for Welsh Government.  The Runnymede Trust found that in Wales the likelihood of Black, Asian and Minority Ethnic people being in relative poverty is 3.5 times higher than white people.  Source: 633d8007a3bfa49bd4cd 0fa8_Runnymede Briefing Cost of Living FINAL.pdf (websitefiles.com)  9% of PGM enrolments where the ethnicity of students was known were from students from a Black, Asian and Minority Ethnic background.  Source: Welsh Government analysis of HESA student record for 2021/22	
Religion, belief and non-belief	It is not possible to establish whether a decision to remove grant entitlement from PGM support will have a	The removal of grant entitlement does not affect the maximum support value available. For those who would	Increase to PGM maximum support value in line with established policy will mitigate for the inflationary changes to

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
	differential impact on those with this protected characteristic.  Existing student support policy is thought to deter students of the Muslim faith from undertaking a higher education. Loans are not compliant with Sharia Law, meaning they may often have to rely on other, potentially less reliable, sources of funding.	otherwise have received a grant/loan split will instead access a loan to the maximum support value (in the same way as a student who did not qualify for grant previously would have).  PGM students commencing a course on or after 1 August 2024 will have to repay a higher loan value compared to eligible students who commenced a PGM course the previous year.  The removal of grant entitlement is a result of significant budgetary pressures for Welsh Government.  9% of the total PGM enrolments in 2021/22 were from students whose religion was not known. Of the remaining PGM enrolments, 60% of enrolments were from students who had no religion, 31% were from Christians, and 3% were from Muslims.  Source: Welsh	costs of goods and services.  Repayments policy mitigates against the impact of increased debt.  No further mitigations are available.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
		HESA student record for 2021/22	
Sex/Gender	Removing grant entitlement from PGM support may negatively and disproportionately impact those with this protected characteristic.  There will be a long- term impact as the increased value of loan (to mitigate for removal of grant) will impact the length of time it may take to repay the student loan (should their future earnings be above the student loan threshold).  There may an impact on participation from female students in postgraduate Master's study in the future. Female students currently make up the majority of those who undertake a programme of study at master's level	The removal of grant entitlement does not affect the maximum support value available. For those who would otherwise have received a grant/loan split will instead access a loan to the maximum support value (in the same way as a student who did not qualify for grant previously would have).  PGM students commencing a course on or after 1 August 2024 will have to repay a higher loan value compared to eligible students who commenced a PGM course the previous year.  The removal of grant entitlement is a result of significant budgetary pressures for Welsh Government.  Cost of living pressures are disproportionately impacting women. This is due to inequalities in the labour market and	Removing the grant will be mitigated by additional loan up to the maximum support value.  Increase to PGM maximum support value in line with established policy will mitigate for the inflationary changes to costs of goods and services.  Repayments policy mitigates against the impact of increased debt.  No further mitigations are available.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
		because women commonly spend more of their income on household goods like food. For women with other protected characteristics, particularly Black, Asian and Minority Ethnic women, disabled women and for those who are a lone parent, the impacts are likely to be even more severe.	
		37% of PGM enrolments were from male students and 63% of enrolments were from female students.	
		Between 2017/18 and 2021/22, on average two thirds of students were female.  Source: Welsh Government analysis of HESA student record for 2021/22	
Sexual orientation	It is not possible to establish whether a decision to remove grant entitlement from PGM support will have a differential impact on those with this protected	12% of the total PGM enrolments in 2021/22 were from students whose sexual orientation was not known. Of the remaining 12,475 enrolments, 89% of enrolments were from	No mitigations are required.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
	characteristic.	heterosexual students, 4% were from homosexual students and 6% were from bisexual students.  Source: Welsh Government analysis of HESA student record for 2020/21	
Marriage and civil partnership	It is not possible to establish whether a decision to remove grant entitlement from PGM support will have a differential impact on those with this protected characteristic.	There is insufficient evidence on the marital status of students to establish any general points about this population.	No mitigations are required.
Children and young people up to the age of 18	It is not possible to establish whether a decision to remove grant entitlement from PGM support will have a differential impact on those with this protected characteristic.	There were no PGM enrolments from students under the age of 18 in 2021/22.  Source: Welsh Government analysis of HESA student record for 2020/21	No mitigations are required.
Low-income households	Removing grant entitlement from PGM support would negatively and disproportionately impact those with this protected characteristic. There will be a long-	The removal of grant entitlement does not affect the maximum support value available. For those who would otherwise have received a grant/loan split will instead access a loan to	Removing the grant will be mitigated by additional loan up to the maximum support value.  Increase to PGM maximum support value in line with established policy will mitigate for the

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
	term impact as the increased value of loan (to mitigate for removal of grant) will impact the length of time it may take to repay the student loan (should their future earnings be above the student loan threshold).  There may an impact on participation in postgraduate Master's study from those with this protected characteristic.	the maximum support value (in the same way as a student who did not qualify for grant previously would have).  PGM students commencing a course on or after 1 August 2024 will have to repay a higher loan value compared to eligible students who commenced a PGM course the previous year.  The removal of grant entitlement is a result of significant budgetary pressures for Welsh Government.  Low-income households fall into the bottom half of income distribution who have been hardest hit by falling wages, rising bills and debt levels due to cost-of-living pressures. This has led to a shortfall in their real disposable incomes.	inflationary changes to costs of goods and services.  Repayments policy mitigates against the impact of increased debt.  No further mitigations are available.

# **Human Rights and UN Conventions**

Do you think that this policy will have a positive or negative impact on people's human rights?

The groups involved still have a right to education, even if they do not necessarily have a right to student support. The change to student support regulations do not affect eligibility to access support, only amends the financial product available (i.e. the removal of PGM grant).