

# **An Effective, Sustainable and Credible Post-18 Education System**

Sheffield Hallam University response  
to the 'Review of Post-18 education  
and funding call for evidence'



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# Foreword

In February 2018, the Prime Minister launched a major review across post-18 education and funding to ensure “a joined up system that works for everyone”. The review, led by the Department for Education, will be informed by independent advice from a panel from across post-18 education, business and academia. The Advisory Panel launched a call for evidence and I welcome the opportunity to be able to respond to this critically important review.

In our response, we have acknowledged that elements of the current system need to be retained, but fundamentally ‘recast’ so that:

- students’ choices are not determined by the availability of funding sources;
- there is access to a means-tested maintenance grant or loan to cover day-to-day living costs;
- there is greater recognition of the positive impact of post-18 education and the benefits of providing an element of public funding;
- a ‘national university bursary’ scheme is introduced so that students can fund their fees above the level of public funding, and for this to be funded by a newly titled ‘Student Bursary Company’. Participation on the ‘national university bursary’ scheme would trigger an obligation to make a ‘Graduate Contribution Payment’ over a time limited period once studies were completed;
- the ‘Graduate Contribution Payment’ should be at the Government’s borrowing rate of interest, so that it is not above RPI;
- a clear distinction is made for prospective students between maintenance and university fees, recognising that the latter pays for more than tuition.

## Professor Chris Husbands

Vice-Chancellor  
Sheffield Hallam University



# The present system

The current system has many strengths. It has:

- widened participation by permitting the abolition of student number controls;
- allowed universities to plan coherently for the future; and
- broadly established a relationship between gains from higher education participation and subsequent contributions.

However, whilst the system is broadly progressive and fair there are five concerns we would want to highlight:

- The system was designed principally as a vehicle for the payment of university fees. Its extension in 2015 to cover maintenance costs means that the poorest fifth of students now graduate with higher levels of debt than the richest fifth. This regressive element has undermined the progressive elements in the system.
- The focus of the debate remains disproportionately weighted towards the headline fee and the level of student loan, rather than in-year affordability for students. National research has highlighted that students are significantly concerned about meeting their living costs while studying.<sup>1</sup> Evidence from our own research shows that living costs are the principle concern with 41% of students expressing worry about this compared to 29% for tuition fees.
- The funding system lacks public confidence and thus legitimacy. In the long term this is not good for universities, their students or the nation. Whatever its economic logic, the system is difficult for the layperson to understand.
- Whilst the level of interest charges on the fee loan are technically not relevant to repayment levels, save for the highest-earning graduates, the rate of interest is seen as unattractive; it is perceived to be unfair that interest accumulates from the first day of the loan rather than from the point of graduation.
- The system is solely geared around the assumed needs of full-time 18-year-old undergraduate students, to the extent that since its introduction in 2012, all universities have seen a steep decline in part-time and mature student registrations. This has reduced diversity in the system.

Based on our mission and track record we feel it is essential that the post-18 education and funding system has at its heart two key principles:

- Improving social mobility through supporting learners from all backgrounds to reach their maximum potential; and
- Supporting regional and national economic growth through the provision of a skills base with sufficient dynamism and diversity to satisfy current and future needs. This would include subject coverage across STEM subjects, the arts, humanities and social sciences.

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<sup>1</sup> Student Funding Panel (2015) An analysis of the design, impact and options for reform of the student fees and loans system in England

# Making choices

## Young people

The information students use to make decisions includes the prospectus, advice from teachers/parents/carers, and experiences at open days. A good deal of evidence suggests that students do not actively use data to inform choices: their choices are frequently based on informal information sources and reputation.

From research with students who chose to come to Hallam and those who were offered a place but declined our offer, we have found that the main reason for going to university after 18 is the belief that students will need a degree for the job they want to do<sup>2</sup>. For these students, the most important factors in study choices are the content of the course and the university/department facilities.

Evidence from our Schools and College outreach activities and collaborations such as the Higher Education Progression Partnership South Yorkshire plus (HEPPSY+) has highlighted that there is a lack of good quality information, advice and guidance on the breadth of opportunities available within the post-18 education system. This issue is particularly significant for students from disadvantaged backgrounds who lack the informal networks that inform choices. We would advocate for more investment to support consistent quality provision of information, advice and guidance (IAG) within Schools.

## Later life

We believe that the dynamics of choice are quite different in later life than at 18-years old. Specifically:

- Later in life, students are more location sensitive. Over 60% of mature full-time undergraduate students at Sheffield Hallam are classed as commuter students (with the same term-time and home address), compared to 34% of young full-time undergraduates. The courses offered in their locality, living costs, and the flexibility of study arrangements are often the most significant factors when choosing further study options. Policy needs to be geared to ensure that there are a range of relevant study options locally if the higher education system is to meet the national economic imperative for workforce development and reskilling.
- Mature students are more price-sensitive. However, given the location issues, there is not a perfectly competitive price market, and price is traded against other considerations.
- There is sound evidence to suppose that employer influence is stronger in later life. They often support costs for mature students where there is a direct return to skill levels as a result of study. This is particularly the case with the apprenticeship levy.
- The Equivalent or Lower Qualification (ELQ) rule is a constraint for some later in life. It precludes funding for a qualification at the same or a lower level than already held and may be a constraint on skill development (e.g. developing skills in new areas).

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<sup>2</sup> Sheffield Hallam Selection and Rejection survey 2017

# High quality alternative routes

New high-quality alternative routes for young people are beginning to emerge as the market develops. However, there are powerful cultural presumptions in favour of undergraduate study as a full-time three-year commitment. Student, parent/carer, employer and media perceptions currently reinforce the model of a traditional full-time undergraduate degree entered by 18/19-year-olds, and significant work would be needed to engage with these audiences to increase awareness of alternative routes and break down perceptions of their quality when compared to the traditional route.

Whilst by no means unique, the UK is distinctive. In other systems internationally, alternative routes are more clearly developed and promoted. In the USA, credit transfer and community college access routes provide a more flexible system, although admissions at highly selective US universities are more socially selective than in the UK. In Europe, undergraduate degrees are often longer than those in the UK. One question for the Review is whether government wishes to limit itself to regulatory and funding levers to help accelerate the growth of alternative modes of provision. There is an arguable case for doing so, but government needs to beware of developing routes which do not command high public confidence and are thus seen as lower status routes for more disadvantaged students; and shaping the market around short-term goals rather than a sense of the overall architecture of a strong and stable system.

Higher and Degree Apprenticeships (HDAs) provide an example of alternative routes. They have been a positive development, allowing universities to plan provision in partnership with employers. At Sheffield Hallam, as one of the leading providers of HDAs, we have seen interest and applications rise significantly over the last two years. The funding system needs to be more streamlined in supporting pathways into higher level skills such as apprenticeships, and encouraging more long-lasting collaborations between higher and further education to facilitate this. However, simplification of the processes for developing new provision of this kind is needed for this to grow further.

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# Price competition

There is no strong international evidence to support the contention that price competition underpins a lively market in undergraduate study. The US market demonstrates a number of things:

- The price dynamic only works in a market where institutions have substantial endowments that support subsidies and 'discounts' for disadvantaged students.
- In the US, price competition has in practice been highly inflationary, since 'high' price is seen as a proxy for 'high' quality (and vice versa). The US market demonstrates that price differentiation follows only when there is no upper price cap, and, given the highly inflationary consequences, it is highly regressive in terms of participation, only partially and weakly ameliorated by scholarships and bursaries.
- Complex discounting arrangements in the US suggest that apparent price competition is a proxy for a good deal of non-price competition.

Evidence from the UK shows there is still little price sensitivity in the postgraduate market, where fees are unregulated, and choice here is still predominantly based on reputation and convenience.<sup>3</sup>

There are more general reasons to suppose that price competition would be relatively undesirable. Price competition is grounded in an assumption that individuals will make rational trade-offs between the current price of a degree (i.e. fee levels) and anticipated future rewards (i.e. lifetime earnings). But this ignores the social goods which derive from university-level study, and the importance of universities in providing workforce development in often expensive-to-provide but relatively low-salary careers such as nursing (and healthcare more generally).

For all these reasons we believe that it is more sensible to consider non-price competition as the driver in the UK undergraduate market. There are a wide range of ways that competition takes place in the UK higher education market. Universities compete for students through developing their own course offerings, high quality teaching and learning facilities, and investing in career and employability services to achieve the best employment outcomes for graduates.

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# Barriers to creating and promoting new routes

The barriers faced by existing providers include:

- Consumer conservatism: The higher education marketplace is generally conservative; the decision to study a particular course is a major, potentially life-changing decision.
- Better employer engagement: We have found employers difficult to engage in developing and articulating progression routes. There is a tendency for even the most engaged to fall back on personal experience. Clear and consistent advice and a concerted employer campaign have been essential. Government could create capacity-building development funding to support this.
- Regulatory risk: There is a potential tension between a system regulated on the basis of risk, which may make providers innovation-averse, and a real desire to see extensive innovation. Current providers will not be incentivised to take risks by the Office for Students (OfS).
- Cost of innovation: By definition, innovation carries a cost, which is inevitably borne before the returns can be realised. In a competitive, price-constrained market, innovation will always be risky.
- Standards approval processes: The complexity of this process has been a brake on the development of HDAs. Addressing this means greater HEI engagement to inform and design standards, and more flexibility for learners to change; completions are important, but industry changes quickly.
- Stability of policy: Innovation takes time. Providers need confidence that time invested in innovation will not be wasted and that the 18-36 months required to design, develop and accredit new programmes will not be overtaken by policy change. This requires an open and balanced relationship between IFA, OfS, QAA, ESFA and OfSTED.

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<sup>3</sup> Sheffield Hallam Postgraduate UK Pricing Research Study, March 2017 found that when choosing a university the most important considerations were: Close to where I live (30%, top answer), reputation of the institution (2nd, 16%), and location (3rd, 15%).

# Flexible higher education provision

ELQ funding restrictions discourage students from broadening their study after 18 or trying a new route at level 3. This means a student has often predicated their pathway by their choices at sixteen-years-old and may find it difficult to get funding to change to an alternative route.

The current funding system has resulted in significant decline in part-time and mature students. At Sheffield Hallam there has been a decline that mirrors the sector position. We believe that the changes to the funding system must address this. While the government has focussed on increasing flexibility in the system to offer more intensive provision (such as accelerated degrees), this may be the opposite of what many part-time and mature students need: our evidence shows that they want more extended provision which can be combined with work. Those wishing to retrain after a period out of the workforce, or to balance study with work need additional time, flexibility and support to succeed.

Incentivising the provision of flexible routes and pathways demands a funding system with more step-off or transfer points that do not disadvantage the student. This would provide better options for students, especially those from disadvantaged backgrounds.

In relation to commuter study options, there is a misconception about the numbers of students currently taking up this option. At Sheffield Hallam 45% of all full-time undergraduates are classed as commuter students.<sup>4</sup> Students' reasons for commuting vary, and our internal research has shown that decisions are influenced by financial considerations, as well as family, relationship, employment, cultural, and social circumstances. Research carried out within the sector, together with our institutional analysis, suggests that there is no single characteristic shared by commuter students which can be identified as a determining factor in their likelihood of permanent withdrawal from study. This makes it very difficult for targeted support to be provided. However, with financial considerations being a significant factor in taking up this option, a focus on increased support for student living costs through maintenance grants would likely make this study option more attractive.

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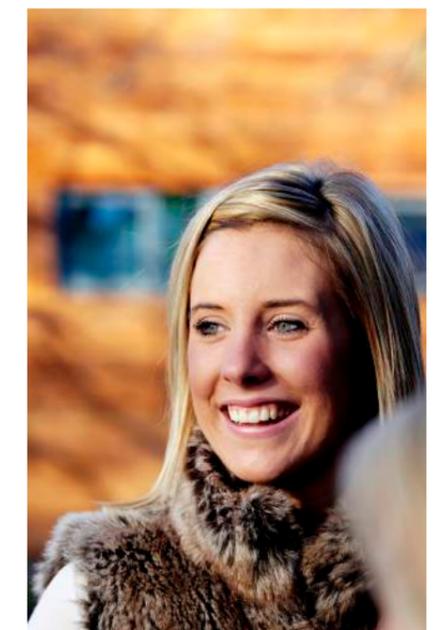
# A system that is accessible to all

The current loan-based fee system has not deterred young people from entering higher education. However, there is evidence that poorer students are increasingly concerned about meeting their living costs while studying.<sup>5</sup>

- The replacement of grants by loans impacts on social mobility. There is good evidence that the maximum maintenance loan does not provide enough for students to live on. Students from more affluent backgrounds will be able to rely on parental support for some or all of their living costs. Students from less affluent backgrounds rely on term-time part-time jobs – sometimes juggling several, with impacts on study-time and long-term success.
- The impact of the switch from grants to loans on students from disadvantaged backgrounds<sup>6</sup> is highlighted further in the recent NUS/Poverty Commission report<sup>7</sup>. This financial barrier compounds the academic barriers that already exist.<sup>8</sup>
- Using the OFFA-commissioned toolkit, developed by Sheffield Hallam, we have evaluated the impact of the additional financial support we provide to our students. Our findings show that that this support, via bursaries, for students from disadvantaged backgrounds has resulted in a significant positive difference on both retention and completion of degree. There was no difference in final classification or progression to highly skilled employment, though this is a positive result when compared to expected outcomes.
- A survey of bursary recipients has also shown that 86% agreed or strongly agreed that receiving financial support helped them to concentrate on their studies without worrying about finances, and 85% agreed or strongly agreed that receiving financial support helped them to feel less anxious.

These findings show the importance and impact of in-year financial support. The Government should reinstate maintenance grants for the most disadvantaged, with a taper rather than a cliff-edge cut-off. This should be funded by new money.

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<sup>4</sup> Based on students whose term-time and home addresses are identical, excluding distance learning and international students.

<sup>5</sup> Student Funding Panel (2015) An analysis of the design, impact and options for reform of the student fees and loans system in England

<sup>6</sup> Institute for Fiscal Studies (2017) Options for reducing the interest rate on student loans and reintroducing maintenance grants

<sup>7</sup> <https://www.nusconnect.org.uk/resources/class-dismissed-getting-in-and-getting-on-in-further-and-higher-education>

<sup>8</sup> In 2016, the attainment gap by the end of secondary school between disadvantaged pupils and their peers was 19.3 months nationally (see Education Policy Institute (2017), Closing the Gap? Trends in Educational Attainment and Disadvantage).

# Levelling the playing field

Both grants and loans can play a role in providing students from disadvantaged backgrounds with maintenance support, as long as students are able to access the appropriate amount to cover living costs, and do not carry burdens associated with these costs over the long term. In redesigning a maintenance system, Government needs to:

- Ensure clear distinction in information for prospective students between maintenance and university fees. We have evidence from prospective students of a lack of clarity about the distinction.
- Recognise that university fees pay for more than tuition. For almost all UK universities, fees are the only source of funding which must cover: direct tuition costs, indirect tuition costs (the costs of the estate, IT, libraries), the costs of the wider student infrastructure (including welfare and sporting services) and the costs of Access and Participation plans (on the management of fee income above £6,000). It follows that the current fee structure is one of the sources of student support for poorer students. It is important that this is recognised; universities do not have alternative sources of funding to provide support for learners from disadvantaged backgrounds.
- Ensure fair levels of support across institutions. A serious limitation on the current OFFA model is the distribution of disadvantaged students across the system: for many institutions, providing more money for disadvantaged students is unaffordable due to the large numbers enrolled. Institutions that have fewer disadvantaged students deploy less resource overall and/or are able to give higher amounts to the smaller numbers of students. Support for disadvantaged students should be publicly funded to ensure equity.
- Weight regular payments for maintenance support according to agreed characteristics, for example, where students have children, caring responsibilities, are estranged from families.

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# Delivering the skills the UK needs

Universities play a critical role in the delivery of advanced technical skills. This is too frequently overlooked. It is particularly true in the context of a university like Sheffield Hallam, with a very strong commitment to the highest quality advanced technical education. More generally, the implied separation of academic and technical qualifications and routes is not one that reflects the current reality of the way this university, and, indeed many others, works. An education system fit for the twenty-first century needs to ensure the acquisition of both academic and technical skills, and to allow for their interdependence. It is important, therefore, to focus on the long-term skill needs of the economy rather than on current institutional structures. Government should consider how it can support greater collaboration between further and higher education providers to develop pathways that allow students to access post-18 education at the same time as balancing other personal and professional commitments.

In South Yorkshire, which we do not believe to be atypical, there is inadequate provision and training at all levels. This is not the consequence of quality failings in individual institutions, either in this region or elsewhere. It is because progression pathways across and between schools, FE and HE are insufficiently clear, because local geography and communication routes, institutional structures and the flow of information, advice and guidance is sub-optimal. As a result, talent is wasted. There are positive initiatives throughout the post-18 system, most recently the development of Institutes of Technology, but few are strategically joined up in ways which would ensure the impact required.

Government needs to establish a much more strategic approach at regional level, with a far stronger focus on place-based policy-making. Universities play a key role in place-based skill development.

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# Value for money: striking the right balance

Post-18 education generates rewards for individuals, through better jobs, salaries, and health, and for society, through improved economic growth, lower healthcare costs and higher levels of civic participation.

The current higher education funding regime, by and large, recognises this and the consequence of the October 2017 repayment reforms are that approximately 53% of the fee costs of participation are met by the graduate and approximately 47% by the state. Arguably, the current system has a reasonable balance between the taxpayer and the student. However, this is not the perception because:

- The speed of transition from a publicly-funded to privately loan-funded regime has fuelled perceptions of intergenerational unfairness.
- The public contribution is secured through the 'unpaid' student debt. The language of default as a planned basis for public subsidy is difficult to convey.

Changes need to continue to recognise the public and private interests in the success of higher education, and to allow providers to plan for their own distinctive development.

Our view is that elements of the current system need to be retained, but fundamentally recast so that:

- Adequate funding is available so that students' choices are not determined by the availability of funding sources.
- Students have access to a means-tested maintenance grant or to private (state-backed) loans to cover day-to-day living costs. We would anticipate FE participation to be supported by maintenance grants.
- There is a stronger recognition of the public interest in participation and a strong, vibrant and diverse system of post-18 education. The most transparent way to do this is through an element of public funding to meet some of the costs of provision. This should be banded by subject cost-group.
- Higher education students should be able to access a national university bursary scheme to fund their fees above the level of public funding, funded by a newly titled Student Bursary Company.
- Participation on the national fee bursary scheme would trigger an obligation to make a Graduate Contribution Payment over a time-limited period once studies were completed, either through graduation or at the point of withdrawal.
- The Graduate Contribution Payment should be at the Government's borrowing rate of interest (i.e. not above RPI).

These redesign principles allow for the recasting of the higher education scheme in terms of contribution, return and support, rather than loans and defaults. It would offer assurance that students/graduates are not carrying large debt repayment costs over long amounts of time, providers are able to cover the cost of course delivery, employers are encouraged to support training/upskilling for their employees and that there is no major long-term burden on public finances.

*Changes need to continue to recognise the public and private interests in the success of higher education, and to allow providers to plan for their own distinctive development.*



# Changing the debate

As set out previously, there is a need to change the language of student financing away from debt and fees to one of contribution. While the income-contingent loan system operates much the same as a time-limited graduate tax, with payments collected through the tax system, student loans are widely regarded as conventional debt. Evidence from the Diamond Review in Wales found that the 'fear of debt' is a key element influencing the decision to study with a disproportionate effect on those from lower-income families.

The Government should make a much stronger distinction between student loans and conventional debt, in terms of it being a time-limited forgivable debt, graduates only paying what they can afford (like a tax), and the remaining balance of repayments not impacting on lenders' decisions in future. This distinction could be furthered by removing the need for interest payments.

We strongly support the Universities UK recommendation that the Government should not apply interest to a student loan during the course of study, and consider whether interest rates should apply at all. The Government should also examine whether it is possible, in partnership with the sector, to provide more targeted financial advice to prospective students, undergraduate students and graduates on the implications of taking out an income-contingent loan.

However, we would also argue that there is relatively limited scope for universities and Government to shape public views. We note the great success of moneysavingexpert.com in shaping perceptions, and reflect that the private sector and informal information networks may be more effective.

*There is a need to change the language of student financing away from debt and fees.*



# Efficiency and transparency

Progress on efficiencies has been made through the FSSG and Diamond Review on Efficiency, and most universities are able to demonstrate ongoing efficiency gains.

As a university we are committed to transparency in our approach to handling issues of both quality and efficiency. We have established an Academic Assurance Committee of the Board of Governors which interrogates the University's internal quality processes; we manage an audit committee which includes external lay representation; we publish an annual report on the ways in which we spend student fee income.

We do believe that some degree of cross-subsidisation within institutions is essential in order to maintain subject areas, to fund indirect student support services and engage with regional and national skills agendas, and to maintain a comprehensive and world-leading higher education system within the UK. We do not believe that this is at odds with a commitment to transparency, efficiency and quality provided that the financial model underpinning the university is clear and that the choice about what subject to study is not based on price grounds.

Nonetheless we do believe that there are elements of the current university system which embed inefficiencies. The persistence of an academic year which begins in the Autumn (largely driven by A-level and similar results) and the relatively inflexible 2012 funding model (which funds by academic year rather than by whole degree or units of study) leads to an inefficient approach to the use of estate. We do not believe that the solution to this is necessarily an increase in the intensification of study (e.g. through two-year degrees), but we would welcome more flexible approaches.

The strongly institutional focus of the UK system makes it more difficult to operate inter-institutional practices including between FE and HE or credit transfer arrangements which would add flexibility to our offer.

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# Value for money

For an individual, value for money is partly secured where the investment in post-18 education results in a highly skilled job and a higher economic return. We say 'partly' because there are attested non-economic returns which also accrue to the individual. The current financial regime encourages a focus on individual return, and the development of datasets such as Longitudinal Educational Outcomes (LEO) has intensified a concern. There is evidence of a sustained graduate premium.

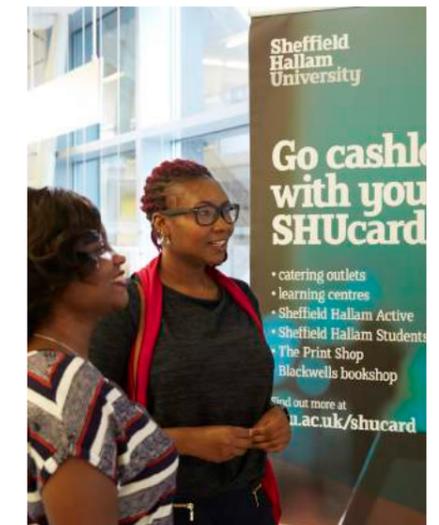
Value for money for the nation is also key. Higher levels of education participation result in a highly-skilled workforce as well as improved levels of health, improved economic growth (increases in participation in HE tracked improvements in productivity until the 2008 recession), lower criminal justice costs, and longer life expectancies<sup>9</sup>. These are social goods which flow from post-18 education.

There are potential tensions between a focus on individual returns and social returns. But there is also a potential tension between a focus on value for money and a focus on extending participation in higher education.<sup>10</sup>

Government does have a role to play here. Stronger value for money will be secured by:

- promoting high-quality information, advice and guidance to help students make the right choices;
- supporting the participation of disadvantaged groups in post-18 education; and
- seeing post-18 institutions as part of a coherent ecosystem rather than as autarchic institutions.

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<sup>9</sup> Hanushek E A and Woßmann L (2010), Education and Economic Growth. In: Penelope Peterson, Eva Baker, Barry McGaw, (Editors), International Encyclopedia of Education, volume 2, pp. 245-252. Oxford: Elsevier

<sup>10</sup> Vignoles A, Shephard, N., Dearden, L, Britton, J, 2016, How English domiciled graduate earnings vary with gender, institution attended, subject and socio-economic background, IFS Working Paper W16/06



