



Policy Statement: Review of the UKRI Standard Terms and Conditions of Training Grant

This policy statement sets out reforms to UKRI’s provision for the training grants that we fund. It sets out our thinking on a series of changes that aim to better support students, including a summary of why we are making changes, some of the feedback we received on them and our assumptions about how much they will cost to implement. The changes themselves can be found in the ‘Annotated revisions of UKRI Standard Terms and Conditions of Training Grant 2025’. They will be enacted through updates to the ‘Standard Terms and Conditions of Training Grant’ (‘the TGCs’), the ‘Disabled Students’ Allowance (DSA) Framework’ and the ‘Training Grant Guidance’ by the start of the 2025-26 academic year.

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Management statement

This policy is owned by the UKRI Talent Team. If you have questions about this document, please contact talent@ukri.org.

Version Number	Status	Revision Date	Summary of Changes
Version 0.3	Draft	July 2024	Draft document provided to UKRI operational panel.
Version 1	Final	January 2025	Document published.

Purpose

The policy aims to:

- Ensure that UKRI funded postgraduate research (PGR) students receive an appropriate level of



support, in line with the strategic aims in the UKRI Strategy 2022 to 2027, the UKRI Equality Diversity and Inclusion (EDI) Strategy and relevant legal requirements.

- Ensure UKRI's expectations on research organisations (ROs) are clear, including clear lines of accountability for legal and regulatory requirements, and that ROs have an appropriate degree of flexibility to support their students.
- The TGCs support UKRI's transition to Collective Talent Funding (CTF), the programme that joins up all our talent investments so that they are simpler and more consistent.

This policy applies to UKRI's support for all students supported by existing and new UKRI training grants. Some students may be funded by UKRI through means other than training grants and we will provide guidance on how we can best ensure they receive a consistent level of provision in April. Some conditions on support for students may not apply to students where they are superseded, for example, by an employment contract or visa restrictions, as discussed below.

Key definitions

Research Organisation (RO). As set out in the terms and conditions, an RO is the organisation to which a UKRI grant is awarded and which takes responsibility for the management of the project and accountability for funds provided. The RO is responsible for ensuring that any training grant activity carried out by the RO, students, supervisors and any third parties complies with the TGCs (see **TGC 2.1**).

Provider. The organisation providing the training to a student funded through a UKRI grant. This could be the RO but it may also be other providers that are partners ("third parties") on the grant.

Project lead. The project lead is a named person responsible for the intellectual leadership and overall management of the grant. They are the main contact for UKRI. The Funding Service, UKRI's new grant system, uses this language alongside project co-lead and grant manager. These roles together might previously have been referred to as "training grant holder". For a [description of all roles, see our website](#).

Training grant. A grant made by UKRI (through one of our councils) to an RO to fund research training. The RO will use this funding to fund individual studentships. Some grants will fund only a small number of students, others fund several cohorts of students over a number of years.

Training Grant Conditions (TGCs). The UKRI Standard Terms and Conditions of Training Grant. Individual conditions are numbered with a TGC prefix, for example, "**TGC 1**".

Student. A person studying for a postgraduate research degree (normally a doctorate, such as a PhD or EngD) who is funded by UKRI, through a UKRI training grant.

UKRI Studentship. The term used for the funding award made by a RO to a student for the purpose of undertaking postgraduate training leading to the award of a postgraduate degree, using UKRI funding. For these purposes, the UKRI studentship normally ends on the date that the student's stipend ends. The student may continue to be registered with an HEP after this point.

A full list of abbreviations and other key terms is in Annex 1.

Principles

UKRI has set out the principles that it expects of training grants in the revised Statement of Expectations for Doctoral Training (UKRI, 2024). The three core principles of the work are:

- **Simplification.** Removing complexity to improve understanding and increase efficiency.
- **Flexibility.** Enabling the tailoring of schemes, training programmes, and/or individual



studentships to better achieve their aims and ambitions, ensuring students' equitable access to the highest quality skills and knowledge development.

- **Equality, diversity and inclusion.** Supporting the progression of a diverse population of students into a range of research and innovation careers by accommodating diverse student needs and career aspirations.

Responsibilities

ROs and providers, where funded by UKRI, will:

- Provide a flexible, inclusive and supportive environment which optimises the student experience and the diversity of the student population to strengthen the quality of the research.
- Ensure that they are and remain compliant with all relevant regulatory and legal requirements.
- Ensure that they are and remain compliant with all UKRI TGCs and pay due regard to UKRI guidance.
- Seek their own legal advice where required.
- Be accountable for the quality of education and support provided to students funded by us.

UKRI will:

- Support UKRI funded students by providing an appropriate level of support for students with different needs.
- Ensure that we are and remain compliant with all relevant regulatory and legal requirements on us.
- Update the TGCs to support ROs in their own compliance efforts, while being clear that the onus on RO and provider compliance ultimately rests with them.
- Provide clear routes for feedback on the TGCs.

Next steps

UKRI has published this document as a transparent record of our decision-making. We may review our TGCs and other associated documents; in the event of any difference between this policy statement and the live TGCs, the live TGCs take precedence.

UKRI intends to publish updates to the Training Grant Guidance and the UKRI Disabled Students' Allowance Framework in April 2025.

The requirements set out in this statement come into effect from the start of the 2025-26 academic year.

Storage

[This policy statement has been published on UKRI's website alongside the annotated standard terms and conditions of training grant.](#)



Executive summary and training grant checklist

In this policy statement we set out a substantial and positive set of reforms designed to better support UKRI funded students.

The ‘Standard Terms and Conditions of Training Grant’ (‘the TGCs’) govern UKRI’s investment in training grants, through which we provide financial support to around 20% of the doctoral students in the UK each year. Many providers and some other funders have chosen to adopt some or all of UKRI’s standards for their own students, meaning the changes that we make have wider influence.

An evidence-based approach

Following the ‘New Deal for Postgraduate Research’s call for input’ in 2022, we committed to reviewing the TGCs from the perspective of Equality, Diversity and Inclusion (EDI). We have taken an evidence-based approach to this work, commissioning a review from Advance HE. That review also compared the support for students to welfare provisions for workers and made around 80 recommendations for change, the majority of which we are now accepting. We also asked the UKRI EDI Caucus to undertake focus groups with over 100 students and staff so that we could better understand what impact current levels of support are having. We have published the EDI Caucus’ report alongside this policy statement.

All of our proposals were reviewed in the summer of 2024 by an operational panel of 30 experts recruited from the sector. The panel, established through an open call, sought to engage deeply with providers. Its membership included representation from graduate schools, professional staff managers, disability support service experts, heads of teams, human resources, financial and legal departments. Overall, they supported the changes, though also provided much useful feedback that we have taken on board. We are immensely grateful for their input, as well as that from the PGR Funders and Providers Forum and the many other colleagues across the sector who have engaged with this work.

The evidence pointed to the need for reform to ensure students are better supported, both for their own health and wellbeing, but also because with better support they are more likely to be successful.

Providing more support to students

The changes outlined in this policy statement do three things. First, they give students more support when they need it. Second, they give providers greater flexibility to support students by allowing them to make more decisions without reference to UKRI. Third, the revised TGCs emphasise that students have legal rights and that it is these that must underpin providers’ approaches to supporting students.

One way in which we will provide students with more support is through better provision of leave. For example, we are extending the time that a stipend can be drawn while a student is on sick leave from 13 weeks to 28 weeks. We have listened carefully to what students and providers have told us, so we are removing our requirements on medical evidence when taking medical leave, with an expectation that the provider is better placed to judge what evidence is proportionate. So that students can take medical leave without impacting their doctorate, we are also clearer on where we expect medical and other forms of leave to lead to an extension, and how the underlying grant finance can be managed accordingly. We expect research organisations to translate these conditions into clear, fair support for UKRI funded students.

Another way in which we are seeking to ensure students have more support is through updates to the conditions on Equality, Diversity and Inclusion. For example, we will require that disabled students are offered reasonable adjustments at the earliest opportunity and that the research organisation or provider has a policy to support this. For our part, we will update UKRI’s Disabled Students’ Allowance (DSA) Framework in April 2025. The framework allows research organisations to recoup certain costs for disabled UKRI funded students from us. Changes will allow costs to be recouped where they were incurred from the point that the studentship is offered, helping students get reasonable adjustments in place as soon as is reasonable – where possible, before they start their degree. We will also allow costs for ergonomic



equipment on site and are continuing to explore whether there are circumstances in which additional time on the studentship might be appropriate to award through a needs assessment and the DSA Framework.

Overall, we want research organisations and providers to use the flexibility we give them to ensure that students are well supported. In this vein, we are removing our restrictions on students moving between full or part-time modes of study, reflecting that research organisations are better placed to make judgements about where such moves are appropriate. We are clear that providers can offer more leave at their own cost. Where providers have a commitment (for example, in their university regulations) to leave type that is not covered by our training grant conditions, they will be able to apply for authorisation to fund this leave type for UKRI funded students from UKRI training grants.

Ultimately, research organisations and providers are responsible for their students. We expect that most providers will be well acquainted with their long-standing legal and regulatory duties towards students. We also recognise that some of those who have worked on postgraduate research training have in the past looked to UKRI for guidance. However, UKRI is not a regulator and while we for the first time are explicit that we expect compliance with consumer law, employment law, Office for Students and Medr regulation (all where applicable), providers remain responsible for their own compliance and regulators for enforcement. Throughout the policy statement we have sought to highlight recent regulatory developments and guidance (such as the Office for the Independent Adjudicator's Good Practice Framework for complaints), and to ensure that our conditions support providers in their own compliance. We hope that a fresh focus on these issues may help some providers to take stock and update their procedures.

Being clear on the costs and benefits

We are cognisant of the current financial pressures in higher education and that the implementation of these changes will have costs. On the whole we estimate that the cost can be met by existing flexibility within our grants, but in the policy statement we set out what steps we can take to provide additional funding where they are beyond the grant cash limit.

We also recognise that the cost of providing doctoral training for providers may increase, either for co-funders of UKRI funded students, or where a funder or provider chooses to adopt some or all of UKRI's provisions for students funded through their means. We are therefore sharing our estimates of the costs in the policy statement. These are comparatively small, reaching around 1.2% of what we spend on doctoral training over four years. Costs should be considered in the context of the benefits both to students' individual welfare and increasing the numbers of students who qualify, particularly amongst disabled students.

Working with research organisations

In this policy statement we explain why we are making these changes. We set out our assumptions and considerations in the hope that these will support providers' and funders' decision-making about the wider student population, as well as some of our next steps. Of particular note, we intend to publish the revised Training Grant Guidance and UKRI DSA Framework in April 2025.

Some of the changes outlined below will require policy changes at the research organisation or provider level, with central services, graduate schools, project leads, co-leads, grant managers and others working together to implement them. The training grant checklist, roadmap and annotated revisions (published separately) can be used to help providers navigate the changes. Following feedback from our operational panel, we are giving research providers have around half a year to implement any changes, including through updates to their university regulations or equivalent, where necessary. The changes will come into effect at the start of the 2025-26 academic year.

We expect that supervisors will want to ensure that their students get the right advice and we will be setting out plans to support providers' own efforts by communicating more directly with students once the measures start to come into effect.



Over the next year, significant changes are being made to the support available to UKRI funded students through our training grant funds and their management.

[Sign up to our newsletter to learn about the latest developments and receive invites to webinars \[GovDelivery\].](#)



The training grant checklist

If you lead or manage a training grant from UKRI, this checklist will help you ensure you are ready for when we update our terms and conditions for the start of academic year 2025-26.

Some of the changes will need to be made across all UKRI training grants the provider participates in, but it's still important you know what the expectations are. If your grant has a number of providers involved, you might need to check they are all aware of the changes.

Remember, this is only a guide. The full changes are published in this policy statement and the 'Annotated revisions to the standard terms and conditions of training grant'.

Accountability and responsibilities of the research organisation



Do you know who in your organisation(s) to highlight issues to if you are concerned about legal or compliance issues? [Page 13](#)



Can your students raise issues or complaints? Do they feel that they can and that they will be respected? Have you considered the OIA Good Practice Framework on complaints? [Page 17](#)



Are you aware of the requirements under consumer law, including to treat students in a way that is transparent and fair? [Page 14](#)



Do students who also take on employment at your organisation have a written record of that work? [Page 16](#)

Leave from study



Do your students and supervisors know what annual, family, medical and additional leave students can access from academic year 2025-26? [Chapter 3](#)



Do you offer any leave not covered by UKRI's new conditions that might need you to apply for "regulation leave"? [Page 33](#)



Does your organisation have appropriate measures to record family, medical and additional leave, and do you monitor this to ensure leave is used appropriately? [Page 34](#)



Do you provide extensions to students when eligible under the new rules? [Page 36](#)



Are you clear what steps you will need to take to help manage funding for extensions? [Page 37](#)



Do you support students returning to study after a period of leave? [Page 39](#)



Do you offer students a phased return to study after a prolonged period of leave? [Page 40](#)

Mode of study



Can your students change mode of study more than once if required? [Page 42](#)



Are you aware that under UKRI's rules, you may offer options other than 50% or 100% full-time equivalent? [Page 43](#)



Do you pay due regard to equality law when supporting part-time students? [Page 43](#)



Are you able to offer students any flexible options for study? [Page 44](#)

Equality, diversity and inclusion



Do you know the personal characteristics protected by law, the protections in place against harassment and victimisation, and protection when students are pregnant or in a period of maternity? [Page 18](#)



Does your organisation(s) have training for staff and have you ensured all your staff have undertaken the training? [Page 20](#)



Do you take steps to ensure that students are not subject to discrimination? [Page 18](#)



Do you ensure health and safety assessments have been undertaken for students who are pregnant or are breastfeeding? [Page 21](#)

Support for disabled students



Are you familiar with the legal definition of disability, and how that might differ from other ways of thinking about disability? [Page 46](#)



Does your organisation have a policy in place to make reasonable adjustments for disabled students and do you know how to use it? [Page 19](#)



Do you tell disabled students that they can request reasonable adjustments at the earliest opportunity? Do your students know how to access reasonable adjustments? [Page 43](#)



Does your organisation's policy on reasonable adjustments for disabled students set out when it is appropriate to ask students for information about their health or disability? [Page 19](#)



If you consider that a reasonable adjustment conflicts with a UKRI requirement, do you know that the legal duty takes precedence, and how to escalate this to UKRI? [Page 20](#)

Miscellaneous



Does your organisation give clear guidance to international students about what leave and support is available to them, taking note of any restrictions on their visa? [Page 22](#)



Do you uprate the stipend on or around 1 October each year? [Page 53](#)



Have you confirmed any outstanding extensions due to Covid-19 before the October 1 2025 deadline? [Page 53](#)

Roadmap for training grants – 2025

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
TGCs and DSA: Provider action	Funded providers need to consider implementation of new UKRI Training Grant Conditions (TGCs)						Providers start to implement new TGCs and new costs become eligible			All ROs must effect new training grant conditions by 1 Oct, including stipend uprating		
TGCs and DSA: UKRI updates	Policy statement and annotated TGCs		Webinar on TGCs	Revised Training Grant Guidance and UKRI DSA	Webinar on TGCs						Full rollout of communications for students and supervisors to support providers	
Student data portal (SDF)			Confirmation of student data portal to replace Je-S SDF			Engagement activities on the new student data portal			New student data portal goes live (TBC)			
Wider policy updates	UKRI to recruit ROs for project on full economic cost of PGR		Updates to role descriptors in grant conditions							Two-year review: the new deal for PGR		



Chapter 1: Introduction

‘Across the sector we work together to ensure that every postgraduate research student gets a high-quality experience, with the right level of financial and practical support. We need to be vigilant and ensure all our programmes are open to people from diverse backgrounds, and that they provide enough flexibility to support people with different needs.’

Professor Dame Ottoline Leyser, CEO, UKRI
Foreword to the New Deal for Postgraduate Research: Response to the Call for Input

An evidence-based approach

- 1.1 In 2023, in our response to the ‘New Deal for Postgraduate Research call for input’ (UKRI, 2023), we committed to reviewing the TGCs with a particular focus on the support for disabled students, parents and carers. This policy statement sets out changes that aim to do that, giving ROs the freedom and flexibility to support UKRI funded doctoral students.
- 1.2 We have taken an evidence-based approach. A call for input (UKRI, 2023) highlighted that many students and providers found the current level of support insufficient. We commissioned a literature review and assessment of UKRI’s TGCs from an Equality, Diversity and Inclusion (EDI) perspective, undertaken by Advance HE (Advance HE, 2023). Advance HE considered current practice and provided a detailed comparison with the welfare support available to people in work as a benchmark. Where helpful we have referred to Advance HE’s recommendations throughout this policy statement. In considering support for disabled students, we also respond to many of the recommendations of Disabled Students UK’s report ‘Improving the experience of disabled PhD students in STEM’ (Disabled Students UK and Pete Quinn Consulting, 2023).
- 1.3 We have also commissioned evidence from the UKRI EDI Caucus (Richards, et al., 2024) to help us better understand the lived experience of students. We are immensely grateful to over 100 students and staff members who participated in the focus groups for us. The study found evidence that the current lack of support is, in some cases, undermining students’ ability to complete their degree. Again, we refer to the report (published alongside this policy statement) throughout.
- 1.4 We are also hugely indebted to the 30 experts from the higher education sector who we recruited to review our proposals as part of our Operational Panel (OP) over summer 2024. The OP, established through an open call on the UKRI Engagement Hub, included representation from graduate schools, professional staff managers, disability support service experts, heads of teams, human resources, financial and legal departments. We provided them with a draft of this statement and asked a series of questions to help us assess the validity of our assumptions, the impact of our changes on research organisations and whether the proposed changes would meet their stated aims. The OP broadly welcomed the proposals but also provided many insightful comments. We have considered all of their feedback carefully and made a number of updates to our proposals in response. We refer to their anonymised comments in this document where this provides useful context.
- 1.5 One key set of comments from the OP was that organisations will need some time to put the changes into effect. Members also suggested that project leads on individual training

grants may not be well-placed to make some of the changes, and that changes might be required to the university regulations or equivalent. We accept that some time is needed ahead of implementation, and so expect the requirements to come into place from the start of the 2025-26 academic year. While project leads will continue to have an important role in providing assurance that the RO and relevant third parties deliver training in line with the TGCs, we also recognise that it may be necessary and more efficient for organisations to consider the changes at the organisation level and apply them consistently across different grants.

Remit and structure of this review

- 1.6 Overall, this policy statement focuses on the actions that UKRI is able to take to support students through reform of our TGCs. There are limits to this approach and so this paper cannot address all issues that currently face postgraduate research students. As we committed to in our response to the call for input, we continue to work with other funders, ROs and central government to develop our evidence base and understand the options available for a wider package of financial support for PGR students with disabilities, children or caring responsibilities. One of the limits is that any support that we provide students in the form of extensions is likely to be limited for international students, who will need to carefully consider the visa requirements on them, and the sponsorship requirements on their university.
- 1.7 In addition to the focus on how students are supported through our work on the new deal for postgraduate research, UKRI has also been engaged in a programme of work to simplify its investment routes for talent through Collective Talent Funding (CTF). As part of CTF (and realising a commitment in the response to the New Deal call for input), in January 2024 we published a revised Statement of Expectations for Doctoral Training (UKRI, 2024). The statement set out, at a high-level, our expectations of new doctoral training grants. The first grants that must adopt these expectations were awarded last year and are now recruiting students who begin their studies in October 2025.
- 1.8 In November 2023 we took the first small steps in making a set of amendments to the TGCs in response to Advance HE's recommendations. Now we set out a series of reforms that put greater emphasis on protecting UKRI funded students. In doing so, we recognise that our role, derived from the Higher Education and Research Act 2017, is not to operate as a regulator. We do have a role as a funder and as a convenor. We have been mindful of this when drawing together these changes.
- 1.9 This is why we do not seek to introduce substantial new regulations, but instead draw attention to numerous legal and regulatory obligations that already exist. In Chapter 2 we discuss those obligations and how, in our view, consistently observing them is essential to resolving many of the complaints underlying the call for input and the Advance HE recommendations. The existing TGCs focus on compliance with the law on financial controls or research regulations; we will also incorporate relevant frameworks for training provision. In particular we focus on consumer law, employment law, student regulators and complaints processes, and equality law. In doing so, we hope to be true to the spirit of Adam Tickell's 'Review of Research Bureaucracy' (Tickell, 2022), particularly the principles of harmonisation, simplification and proportionality.
- 1.10 The following chapters set out how we aim to support ROs in compliance with both our requirements and third-party regulations. We want to work with the sector to ensure that we do not inhibit good compliance and structure our grants or additional funding to truly support postgraduate training. Chapter 3 therefore sets out proposed changes to UKRI's support for leave from study including for students who are ill, disabled or in a range of other circumstances.



- 1.11 Chapter 4 discusses changes around modes of study, allowing ROs to give students more flexibility when moving between full or part-time modes or working more flexibly.
- 1.12 Chapter 5 sets out reform to the UKRI Disabled Students' Allowance (DSA) Framework and new guidance on reasonable adjustments for training grants. We will amend the UKRI requirements on medical evidence and allow some new costs to be eligible under the DSA Framework, better aligning with DSA for undergraduates. We also commit to further work on whether we can allow additional time for disabled students who study at a slower pace through the DSA Framework.
- 1.13 Chapter 6 sets out a further set of reforms related to UKRI's programme of work that is bringing together our councils' talent programmes through CTF, alongside some miscellaneous changes to stipend rules and Covid-19 support. Of note, we clarify an expectation that stipends are updated from or around 1 October each year.
- 1.14 Finally, in Chapter 7 we discuss the costs and benefits of the changes, including an assessment of the changes in the light of the principles set down in the 'Review of Research Bureaucracy' (Tickell, 2022). Overall, we estimate that the changes will increase spending on training grants by around 1.2% while also yielding an increase in student retention equivalent to 2% of student starts. Taking all factors into account, spending is likely to remain within current total budget allocations for training grants.
- 1.15 Throughout this work we wish to emphasise that many of the protections that some students called for in our call for input are already in place. That these protections are not well understood indicates that, as a sector, we need to work together to ensure they are more visible and accessible. We have therefore tried to set out, through reforms to our TGCs, where we wish to emphasise existing protections. This means our rules should better reflect the standards expected of education providers and our role in supporting them. By its nature, this means this document focuses extensively on rules. But compliance is not in itself the end goal. Through these reforms we hope to foster a culture that supports student success in their future professional lives and their research, no matter what their background or needs.

Chapter 2: Accountability, legal and regulatory requirements

- 2.1 In this chapter we set out the legal framework underpinning UKRI’s support for postgraduate research training. We also highlight some of the other legal frameworks that support the provision of education. In doing so we hope to address concerns, expressed in responses to our Call for Input, that doctoral students:

“fall into a “grey area” between students and academic staff, meaning their “voice is not heard in either capacity” (UKRI, 2023, p. 31).

- 2.2 We have carefully considered UKRI’s role in the system for supporting research training. UKRI was established by the Higher Education and Research Act 2017 (HERA). Section 93 of HERA sets out UKRI’s functions in respect of carrying out, facilitating and disseminating research. It gives UKRI a power to encourage and support the provision of postgraduate training “in science, technology, humanities and new ideas.” Under section 93 we have the power to establish terms and conditions for our funding, and also to require the repayment, in whole or in part, of sums paid by UKRI if any of the relevant terms and conditions are not complied with.
- 2.3 In addition, the ‘Regulatory Framework for Higher Education in England’ (OfS, 2022) requires that English higher education providers comply with UKRI’s terms and conditions in respect of any funding received from us and that a breach of our conditions will also be a breach of the OfS’ Condition G2 of registration.
- 2.4 A number of the Advance HE recommendations suggest introducing new requirements to the TGCs that either underline or supplement regulations that exist elsewhere in legislation or regulatory codes and guidance. Through our proposed changes to the TGCs we wish to emphasise that UKRI expects providers to comply with the relevant regulatory regimes and to ensure that we have clear options should failings emerge. We have been mindful of the need to do so in way that harmonises with wider obligations, is comparatively simple and is proportionate¹.
- 2.5 **TGC 2.2** states that “You must ensure that the research supported by the Training Grant is carried out in accordance with all applicable ethical, legal and regulatory requirements...” This general provision should cover all legislative requirements on ROs, but to date there has been an emphasis on financial controls and research regulation. We are therefore amending the general provision to state that it applies to “research *and training*” (emphasis added).
- 2.6 **TGC 2.2** goes on to set out some of the legal or regulatory concerns that may impact training grants: “...including but not limited to relevant provisions of the General Data Protection Regulation, the Data Protection Act 2018, the Bribery Act 2010, the Fraud Act 2006, the Equality Act 2010, and the Modern Slavery Act 2015”. For clarity, and to ensure the emphasis of **TGC 2.2** rests on all ethical, regulatory and legal provisions being met, we are removing reference to individual items of legislation. Instead:
- Of the legislation mentioned in **TGC 2.2**, data protection is also referred to in the preamble to the TGCs and Annex B; the Equality Act in **TGC 3.4**; Modern Slavery in **TGC 3.5**. These references are therefore duplicates of other requirements and have been removed without amends to other TGCs.

¹ For a wider discussion of how we have sought to align to the principles for research bureaucracy set out in Tickell (2022), see Chapter 7.

- References to the Bribery Act and the Fraud Act are not found elsewhere in the TGCs, though conditions around fraud are included in **TGC 7.3.3**. We have removed these from the general provision in **TGC 2.2** and placed them in new provision **TGC 2.17** and **2.18** respectively.
- 2.7 Redrafting the TGCs so that the Bribery Act and the Fraud Act have their own TGCs is more consistent with the rest of the document, as **TGC 2.2** had not mentioned other legislation that is referred to elsewhere within our TGCs, including the National Security and Investment (NSI) Act 2021 (**TGC 2.2.3**); the Subsidy Control Act 2022 (**TGC 2.3.1** to **2.3.4** and **7.2.2**); the Animals (Scientific Procedures) Act 1986 (**TGC 3.2**); the Freedom of Information Act 2000 or Environmental Information Regulations 2004 (**TGC 7.3.1**).
- 2.8 Some of our OP noted that it would be unreasonable to expect all project leads to be familiar with the detail of all the legal standards that we expect grants to comply with. While this is true, most OP members confirmed that their organisations already have compliance and other processes in place to support staff. What we seek to do is to ensure that those managing training grants are at least mindful of their organisation’s responsibilities. The approach might be similar to employment law where managers have a working knowledge of key concepts and would refer to experts in human resources teams if they have any specific enquiries.
- 2.9 We also received some feedback that UKRI should consider listing all legislation that ROs should comply with. We are aware from other feedback that in some cases the TGCs have been seen as a guide to delivering PGR. We would emphasise that the TGCs should not be used in that way, as ROs are responsible for their own legal compliance. That said, there are other legal and regulatory requirements that apply to higher education that, to date, we have not mentioned in the TGCs. Given the evidence considered in this review, we are now introducing further references to the need to comply with consumer law, employment law, and student regulators and ombudsmen.

Consumer law

- 2.10 Consumer law includes, for example, the Consumer Rights Act 2015 or the Unfair Terms in Consumer Contracts Regulations 1999 (UTCCRs). The OfS provides a useful summary:
- ‘As set out in the CMA’s guidance ‘UK higher education providers – advice on consumer protection law’ there are three areas where providers have obligations to students under consumer protection law:*
- information, which must be clear, accurate and timely;*
- terms and conditions of contracts, which must be fair and transparent;*
- organisational complaint handling processes and practices, which must be accessible, clear and fair’*
- 2.11 Note that timely information can include information provided to individuals before they apply for studentship, hence having an understanding of the requirements from the outset of any recruitment is essential. For English Higher Education Providers, it is also a requirement of OfS registration (Condition C1) that the provider “must demonstrate that in developing and implementing its policies, procedures and terms and conditions, it has given due regard to relevant guidance about how to comply with consumer law protection” (OfS).
- 2.12 The Competition and Markets Authority (CMA) has longstanding and detailed advice on consumer law for higher education providers, which it revised in 2023 (CMA, 2023). Though the CMA’s advice is largely written for provision of education to undergraduates,

the update in May 2023 highlighted that consumer law may apply to postgraduate research training. In particular, the CMA highlights the case of *Oxford University Innovation Ltd v Oxford Nanoimaging Limited* (2022). In that case, a university body was the complainant and the student the defendant. Part of the student's defence was based on the UTCCRs; the university body contended that the student could not rely on the UTCCRs as the doctoral training was for the purpose of trade or professional activity and such contracts are excluded from the UTCCR's protection. The judgement found in favour of the student and that, at least in that case, a doctoral student could rely on UTCCRs for protection.

- 2.13 However, there could be some students who cannot rely on the protection of consumer law. We cannot provide legal advice to other organisations, so project leads seeking clarification on whether a student might be able to rely on consumer protection law will need to seek advice from, for example, their organisation's legal team. For this reason, in introducing consumer law into our TGCs, we will note that the rule applies "where Students are likely to be Consumers". One OP member who had reviewed the draft policy statement commented:

'I think it is clear. I had to seek advice on determining whether our students are 'likely to be consumers' but this is in fact straightforward - student status = consumer, any activities they do as an employee (usually tutoring and demonstrating) = employee.' [Operational Panel member]

- 2.14 This is perhaps a simplification and (as we do not provide legal advice) we do not endorse it, but it demonstrates how organisations themselves might adopt some simple "rules of thumb" to help support project leads and other non-legal staff in navigating some of the issues.
- 2.15 Where students are likely to be consumers, new **TGC 2.19** harmonises with the OfS requirement that the RO pay due regard to relevant guidance about consumer protection law. Though OfS regulations only apply in England, consumer law applies across the whole UK, so we judge this to be proportionate. In translating the requirement into our TGCs, we have amended it slightly to reflect that most training grants and project leads will be utilising wider organisational processes rather than setting up bespoke services for their training grant.
- 2.16 We have also considered comments from our OP that project leads and other staff working on training grants may not currently be familiar with consumer law. We therefore intend to amend the training grant guidance to make reference to the OfS' helpful summary, quoted above.

Student representation

- 2.17 Advance HE asked us to consider whether expectations on providers' treatment of students in the event of a suspension or change to masters of research are fair and whether students might have a right to representation. While around 9% of students are likely to terminate before the end of their funded period, we currently believe that terminations without mutual consent (that is the provider withdraws the students' registration) are rare. Nevertheless, UKRI maintains an interest in securing value for money from our investment as well as wanting to ensure students are treated fairly. Grievance and termination procedures should in particular be undertaken in a manner that is fair and transparent, and that pays due regard to consumer law.
- 2.18 We are not aware of a specific legal requirement that students be allowed a companion at grievance meetings, though the [OIA has guidance on representation](#) for complaints and appeals procedures as part of its Good Practice Framework (OIA, n.d.). Overall allowing appropriate representation may be beneficial to the student and the RO. We will therefore amend **TGC 6.2.2** to state that the RO should treat a student in a manner that is



“transparent and fair”, language consistent with consumer law. We will also require a written record to be maintained and, where appropriate, allow a companion at any grievance meeting.

Employment law

- 2.19 In a recent survey, around three-fifths of the providers which responded had at least one member of staff studying as part of an employment contract (SQW, 2025). That said, the vast majority of students funded through UKRI training grants are not training under an employment contract, though potentially small numbers might be. A more significant number of students are likely to be undertaking small amounts of work such as teaching or demonstration for the provider alongside (but separate from) their doctoral training. If an employment relationship exists between the student and provider then employment law must be met, irrespective of whether arrangements are in place for UKRI to provide additional funding. New **TGC 2.20** will make that requirement clear.
- 2.20 While some of our OP members felt it would be helpful for UKRI to provide more clarity on when an employment contract is required, we note that we are not able to provide legal advice. It may be helpful to highlight that the definition of employment can be broad, and while definitions may vary slightly, the Minimum Wage Act serves as a useful example:
- ‘54(1) In this Act “employee” means an individual who has entered into or works under (or, where the employment has ceased, worked under) a contract of employment.*
- 54(2) In this Act “contract of employment” means a contract of service or apprenticeship, whether express or implied, and (if it is express) whether oral or in writing.’*
- 2.21 Particular care should be taken where someone who is a student is also engaged to undertake some paid work for the provider, including small amounts of teaching or demonstration. The British University Finance Directors Group (BUFDG) has previously issued guidance to its members on maintaining clear records distinguishing between what may be regarded by tax authorities as studentship income for the student’s maintenance, and remuneration in return for work an individual does in service to the provider. The guidance goes on to suggest that the provider should consider a separate employment contract for work and pay as an employee (BUFDG, 2022, p. 7).
- 2.22 UKRI already requires that where such paid work takes place, it is not funded by the training grant (**TGC 4.6**). We have clarified in the TGCs that, in addition to being a breach of the UKRI TGCs, failure to comply with this condition could result in an HMRC tax liability on the provider and/or the student.
- 2.23 Generally, while UKRI grant funding is not income within any section of the taxes acts, providers should take care to ensure their practices are compliant with relevant tax law and seek their own legal advice if required.
- 2.24 Though not expressly stated, the new **TGC 2.20** and **TGC 4.6** will seek to ensure that delivery of the training grant is conducted in a way that is lawful and compliant with relevant legislation. We accept that small amounts of paid work such as teaching and demonstrating may, in some cases, be beneficial to the student, and the Training Grant Guidance already has advice on the issue. However, the purpose of the training grant is to support student training. Provision of paid work for the RO should not override our expectation, set out in the Statement of Expectations for Doctoral Training (UKRI, 2024), that the RO supports students to complete their doctoral training within their funded period.



- 2.25 While, as above, it is acceptable for a student to be on an employment contract, where this is the case we build on BUFDG's advice and make it a condition of our funding that this contract is written. UKRI students must not be on an oral or implied employment contract, and ROs may need to take steps to ensure that supervisors or other staff do not imply that a student is in service to the university, for example, by asking a student to teach "for experience" while in receipt of a stipend.

Student regulators and ombudsmen

- 2.26 Regulatory regimes are designed to ensure that students can be assured that they are provided with a consistently good service. Though UKRI has only a limited role in the regulatory regimes, it is essential to the experience of students and to achieving value for money on UKRI's investment that the relevant regulatory standards for the provision of education are met. Unlike employment law or some consumer rights, these tend to apply irrespective of whether the student is on an employment contract.
- 2.27 The Quality Assurance Agency (QAA) provides impartial regulatory and collaborative quality assurance to education providers. The QAA's regime is not based in statute. The QAA notes that its Quality Code has been:
- '...developed by QAA on behalf of the UK Standing Committee for Quality Assessment (UKSCQA) in 2018. It is a key reference point for the quality arrangements in Scotland, Wales, and Northern Ireland. In England, the Quality Code is not regulatory, but providers are able to use it to inform their approach to quality, as a way of providing comparability across the UK and to aid international visibility.'*
(QAA, n.d.)
- 2.28 UKRI expects training to be provided in line with the QAA's Quality Code including, but not limited to, the Doctoral degree characteristics statement (QAA, 2020).
- 2.29 Higher Education Providers in England are subject to the Office for Students (OfS) regulation. The OfS website details both its regulatory framework and advice and guidance. Regard to QAA and OfS are subject of a new requirement at **TGC 2.21**.
- 2.30 On 1 August 2024, Medr took over specific regulatory duties for Welsh higher education institutions from the Higher Education Funding Council for Wales (HEFCW). Medr is developing a new regulatory system for tertiary education that it expects to be fully established by August 2027. We will continue to work with colleagues in Wales, Scotland and Northern Ireland to consider whether any future changes are required to our TGCs to reflect the regulatory regimes in those nations.
- 2.31 From time to time the need will arise for a student to make a complaint about the level of service provided to them by their provider. There are statutory ombudsmen which can resolve complaints from students. The services are devolved to a national level. The OIA covers England and Wales, while the Scottish Public Sector Ombudsman and the Northern Ireland Public Services Ombudsmen accept complaints from students at institutions in those nations. Unlike regulators or UKRI, ombudsmen are set up to resolve complaints from individual students about their education.
- 2.32 The existence of formal complaints in themselves do not indicate systemic poor practice on behalf of the RO. On the whole, our preference is that there is a clear and well-known complaints policy which enables students to make complaints and for these to be resolved efficiently and satisfactorily. It is not desirable to have a low number of complaints if this indicates issues are not surfaced and resolved.



- 2.33 Advance HE recommended that UKRI considers providing guidance on complaints. While we are supportive of the ambition behind the recommendation, we note that there is already good advice for providers and students. The OIA in particular has a detailed Good Practice Framework which sets out principles and operational guidance to support higher education providers in England and Wales. Providers in Scotland and Northern Ireland may also find its guidance helpful.
- 2.34 Nevertheless, the EDI Caucus found that:
- ‘What prevented doctoral students complaining, even about serious causes for concern, varied in terms of being perceived as counter-productive and fighting a powerful system that is resistant to change.’*
(Richards, et al., 2024)
- 2.35 Providers should seek to counter this view and instead ensure that managing complaints and feedback from students is seen as an essential part of the continuous improvement of training provision. We particularly draw attention to the OIA principle that ROs “support an open and positive culture of listening to feedback and sharing learning that encourages students to have confidence that they will be treated fairly” (OIA, n.d.). As such we have redrafted **TGC 2.12** to be clear that ROs must have a policy to support the efficient and satisfactory identification and resolution of complaints from students, and that ROs must pay due regard to any guidance from the relevant ombudsman.
- 2.36 A successful complaint from a student may occasionally have financial implications. The OIA advise that a student may be entitled to a reduction in fee, a payment in respect of distress or an increase in the period of study. Any liability will fall on the receiver of the successful complaint, unless with the exceptional agreement of us. The OIA note that:
- ‘Where we recommend a refund of fees, we will normally recommend that the provider returns the money to the source it came from, for instance, the Student Loans Company’ (OIA, 2019)*
- 2.37 A refund in fee would, where the fee was drawn from the UKRI grant, normally result in repayment of part of the fee to UKRI, whereas a payment in respect of redress would be paid directly to the student.
- 2.38 Where a student is also undertaking a small amount of work, they may also be an employee. There may be separate processes for making complaints governed by separate legal considerations for employees. Though activities outside of the studentship are not generally subject to the TGCs, as with our updates in the section above, providers should ensure their complaints policies makes clear to students the appropriate route for making complaints that do not regard their study.

Equality law

- 2.39 We will move the existing requirement to observe the Equality Act 2010, which was in **TGC 2.2**, to **TGC 3.4.2**, under Equality, Diversity and Inclusion. We also intend to introduce further changes to support our objectives to address some of the issues that underlie many of Advance HE’s recommendations.
- 2.40 In England, Scotland and Wales, equality law is largely governed by the Equality Act 2010, which (in part) consolidated earlier legislation. The act is enforced by the Equality and Human Rights Commission (EHRC), which has produced guidance for its application in Higher Education. In Northern Ireland several pieces of legislation exist in relation to

equality – we are referring to these collectively as “equivalent legislation in Northern Ireland”².

2.41 In the case of equality legislation, the Equality Act 2010 and equivalent legislation in Northern Ireland place clear responsibilities on providers. It is essential that providers deliver against these. There are also certain responsibilities on UKRI. For example, like Higher Education Providers and some other public bodies, UKRI is public authority for the purposes of the Public Sector Equality Duty in section 149 of the Act³.

2.42 Both UKRI and ROs are also subject to a duty to make reasonable adjustments for disabled persons. One requirement under this duty is:

‘where a provision, criterion or practice ... puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.’

2.43 Broadly similar requirements apply in Northern Ireland. We are amending the TGCs to make clear that the liability for providing reasonable adjustments for students (including anticipatory adjustments) lies with the provider in the first instance.

2.44 We are therefore introducing **TGC 3.4.3** which states an RO or provider must have a policy that enables it to put in place reasonable adjustments (including anticipatory reasonable adjustments) where required covering the breadth of a student’s research, including to the research environment, within their department, during field work and while on placement. As responsibility ultimately rests with the provider, the TGC states that a provider must put in place an adjustment that it deems reasonable even if it is not funded or authorised by us (that is, potentially at its own expense). Such a policy may cover the whole provider, rather than specific policies for individual training grants, though consideration will need to be given to partnership agreements and ensuring that all partners are capable of providing reasonable adjustments. Some of our OP members indicated that most providers would have a policy or policies already, though as one said:

‘Although ROs have likely addressed student-related issues, they may not have comprehensive research and PGR policies and documentation aligned with the new TGCs’

2.45 We would emphasise therefore that while a policy might be broader than UKRI doctoral students, where this policy is being used for our students it must be appropriate. For example, in considering disabled students’ allowances it would need to reflect that costs for adjustments for UKRI funded students are eligible under the UKRI DSA Framework; it should not only refer to undergraduate DSA schemes.

2.46 **TGC 3.4.3** further states that a RO’s policy should set out in what circumstances students are asked for evidence of a disability. This reflects the findings of the OfS funded Disabled Students’ Commission that:

‘The sharing or disclosure of information is a key touch point for students... The disabled student view is very clear that they find it frustrating, off-putting and disrespectful to be repeatedly asked to share the same information’

² The Equality Commission for Northern Ireland has a webpage describing legislation that applies there: [ECNI - The Law, Equality Legislation, Equality Commission, Northern Ireland \(equalityni.org\)](https://www.equalityni.org/ECNI-The-Law-Equality-Legislation-Equality-Commission-Northern-Ireland)

³ The EHRC has further information on the implications of the duty on its website: [The Public Sector Equality Duty \(PSED\) | EHRC \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/public-sector-equality-duty)

about their disability.'
(*Disabled Students' Commission, 2023*)

- 2.47 It also reflects the appeal judgement in *Bristol v Abrahart* (2024), which found that while it could be appropriate for providers to require evidence to verify what a disabled person says or make well informed decisions, there are circumstances where careful consideration is required of what evidence is sufficient. The judgement is discussed in more detail in the chapters below.
- 2.48 Reflecting our own duties under the Equality Act 2010, we will also introduce new **TGC 3.4.4**, which states that where an RO considers a conflict or tension arises between a reasonable adjustment it provides for a disabled person, and a UKRI provision, criterion or practice (including, but not limited to, the TGCs) your statutory obligation to provide the reasonable adjustment takes precedence but the RO must notify us of any and all such instances. We can then consider whether we should provide a reasonable adjustment to our policy. We intend to publish further guidance on how we will manage such requests in April 2025, as set out in Chapter 5.
- 2.49 We have also expanded our previous requirement on suitable training in EDI. As recommended by Advance HE, **TGC 3.4.6** states that training should include:
- information on what characteristics are protected and how the law defines these
 - harassment and victimisation
 - specific protections regarding maternity in non-work cases
 - making students aware of the Equality Advisory Support Service (EASS) in England, Wales and Scotland.
- 2.50 Our OP noted that some providers may have existing training packages that provide some, but not all, of these elements, and asked whether they would need to recommission training. We note that these elements “should” rather than “must” be included. This means that it remains our preference that providers include these elements in their training, but we recognise there are circumstances where alternative courses of action might be appropriate. For example, it would be acceptable for an provider to not include all of these elements from the start of the 2025-26 academic year where they intend to do so in the future, or where they promote the elements through other means, for example, through an email.
- 2.51 Our intent with **TGC 3.4.3** and **3.4.4** is to give students, ROs, providers and ourselves clarity on where responsibility for providing a reasonable adjustment lies and ROs the flexibility they need to support students.
- 2.52 Advance HE recommended that UKRI provide guidance to ROs on the use of positive action in relation to the recruitment to and awarding of studentships. UKRI does not recruit students directly to our training grants and we have a limited role in providing positive action for students. An RO or provider may engage in positive action, but where it does so it is the responsibility of the RO to ensure that such initiatives are compliant and are delivered in line with the relevant equality legislation. This includes the public sector equality duty, as well as specific positive action provisions under sections 158 and 159 of the Equality Act 2010, and equivalent legislation in Northern Ireland. In all cases there should be a demonstrable disparity for the protected characteristic in question and the RO must be able to justify the use of positive action as a preferential tool and should be able to evidence the impact against the set target category after implementation of the initiative. Provided all legal requirements are met, UKRI is happy to support such activity.



- 2.53 On balance, the requirements regarding equality law in **TGC 3.4** are sufficient and where a grant holder is unclear on whether positive action or other activity is allowable under the legislation they should seek their own legal advice. Information for higher education providers is also available from Advance HE's website (Advance HE (prev. Equality Challenge Unit), 2012)⁴.
- 2.54 UKRI is also committed, through Research England's (RE) partnership with the OfS and other means, to improve participation in education. For example the £8 million RE and OfS funding programme to improve access and participation for Black, Asian and minority ethnic students in postgraduate research (OfS, n.d.).
- 2.55 Advance HE also recommended that we ensure that the sexual harassment provisions of the Equality Act 2010 are mentioned in relation to sexual exploitation, abuse and harassment. We updated the TGCs in 2023 to reflect changes in UKRI's 'Preventing harm (safeguarding) in research and innovation policy' (UKRI, 2020). In addition, we are now introducing **TGC 3.4.6**. This builds on the existing condition that requires all staff and doctoral student to receive suitable training, information and support, and we will now state that this should include information on harassment and victimisation.

Health and safety and equality law

- 2.56 One Advance HE recommendation that underlined the importance of observing equality law asked us to consider whether we should require that ROs not use health and safety as a blanket policy to restrict students bringing children onto campus. The concern was verified by students in their responses to the EDI Caucus. The EDI Caucus heard from students who found that restrictions on their child accessing campus, without any alternative for childcare, was in some cases impeding mothers' ability to study. This underlines the importance of the legislation, as the Equality Act 2010 specifies that direct discrimination in regard to sex may include less favourable treatment of a woman because she is breastfeeding⁵, and specific clauses on maternity discrimination in non-work cases which protect a student's access to education for 26 weeks beginning with the day on which she gives birth.
- 2.57 We have amended **TGC 3.3** on health and safety to reflect that ROs must have regard to equality legislation, to reflect the Equality Act 2010's language in respect of what constitutes discrimination (that is treating one person less favourably than another), and the need to demonstrate that if they do discriminate this must be, as stated in the act, a "proportionate means of achieving a legitimate aim". We cannot determine whether or not excluding children from campus is a proportionate means of achieving a legitimate aim, as this is the provider's responsibility and the assessment is likely to be influenced by factors over which we have no knowledge or control.
- 2.58 The characteristics that we have identified in **TGC 3.3** are those identified by Advance HE and the EDI Caucus; however, these are not the only characteristics protected by legislation to which providers will need to have regard.
- 2.59 In discussing the above with our OP, we noted that there is a duty on employers to provide a general workplace risk assessment which must also cover the needs of women of childbearing age⁶. This should cover both workers and other persons who interact with the employer, meaning that it likely covers students. However, the law also requires that an

⁴ [Positive Action | Advance HE \(advance-he.ac.uk\)](https://www.advance-he.ac.uk)

⁵ See Equality Act (2010) C2 A. 13 (6)

⁶ The Health and Safety Executive is the government agency that regulated health and safety. It has guidance on protecting pregnant workers and new mothers, see: [Protecting pregnant workers and new mothers – HSE Executive](#)



employer carry out an individual risk assessment to cover a *worker's* specific needs, when the worker has informed the employer in writing that they are any of:

- pregnant
- breastfeeding
- have given birth in the last 6 months.

- 2.60 Unless they are a worker or employee, this second provision does not appear to cover students, even where they might be studying in labs, archives or other facilities alongside workers. The UKRI Training Grant Guidance has previously required that ROs assess the research environment for pregnant students. We have now amended the TGCs so that an individual risk assessment is a requirement when a student is pregnant, breastfeeding or has given birth in the last 6 months. We assume that the provider will be the most appropriate organisation to undertake the risk assessment, with the RO or project lead taking reasonable steps to ensure that this takes place.

Differences in legislation across England, Scotland, Wales and Northern Ireland

- 2.61 In its review of the TGCs, Advance HE highlighted that the differences in legislation between England, Scotland, Wales and Northern Ireland were not always reflected. For example, we referred to the Equality Act 2010, which does not apply to Northern Ireland. We are amending the TGCs to be clear, both in (1) sections that refer to specific pieces of legislation are clearer about where they apply and (2) **TGC 2.2** has been amended to reflect that the RO and provider is responsible for meeting all legal ethical, and regulatory requirements in the areas in which they are supporting UKRI studentships. ROs and providers may need to pay particular regard to differing legal environments when providing training in other nations.

International students

- 2.62 International students must comply with the visa conditions required by UK Home Office. Obligations rest on the student themselves, as well as on the provider as sponsor. There is an interaction between the TGCs and visa conditions that may be particularly relevant where a particular provision in the TGCs is not fully applicable because of the visa conditions. For example, UKRI may allow 12 months for maternity leave, but the conditions on a student's visa mean they have to return to their home country during a period of leave.
- 2.63 Attention should be paid to the requirements of the consumer law, employment law, regulation and equality law, as these may still have application even where the visa conditions means that the normal conditions of students will not apply. It is necessary to treat international students clearly and fairly, setting out what support is on offer to them, and to consider what alternative adjustments are reasonable if, for example, leave is not an option.
- 2.64 UKRI is not able to provide regulated immigration advice. We have sought to be clearer in the TGCs where the RO or provider may need to consider visa conditions but this may not be exhaustive and the RO or provider will need to satisfy itself that they consider the implications of visa conditions on any areas of our TGC.

UKRI's role and responsibilities

- 2.65 Overall, we seek to have a set of TGCs that support providers as they support students. The revised TGCs should be clear both that there is already a significant regime designed to support students and that UKRI expects those it funds to be compliant with those



standards. We are not a regulator, ombudsman or tribunal service, so it may not always be for us to determine compliance with legal or regulatory regimes. However, if an RO or provider does not engage with the regimes that are there to protect students (and their selves) we ultimately we have the right to remove our funding.

- 2.66 ROs may need to remind staff responsible for students and grants that compliance with UKRI's TGCs is not necessarily sufficient to be compliant with the wider legal and regulatory requirements on them. The onus is on the RO and partner-providers to ensure that their staff understand the requirements and have effective measures to ensure compliance.
- 2.67 We are also mindful that UKRI's TGCs should not restrict providers' ability to make decisions about the students that they manage and recruit, particularly around reasonable adjustments. Hence, UKRI's TGCs should be seen as managing our relationship with the RO, not the RO's relationship with students. We are therefore amending **TGC 2.11** to make clearer that you may give additional support to UKRI students:

TGC 2.11 You or another funder must not apply any additional terms and conditions to a Student's award, which conflict with these Training Grant Terms and Conditions or any guidance issued by Us. *You may however provide a Student with additional support (not funded by us), at your discretion.*
[New text in italic]

Application of this section

- 2.68 When we asked our OP about the changes, some noted that project leads, co-leads or others involved in the day to day management of the grant and studentships are unlikely to be legal experts and may not be familiar with all the new legislation being referred to.
- 2.69 These changes may therefore be more appropriately considered at the level of the research organisation, rather than the individual project lead or co-lead.

Chapter 3: Leave

- 3.1 In its review, Advance HE highlighted a number of reasons why a student may require leave where provision is currently unclear or unavailable. In this chapter we outline changes to cater for the areas highlighted by Advance HE as well as other areas identified by us. The TGCs on leave have been reorganised around four categories: annual leave, medical leave, family leave and additional leave, each of which is discussed below.
- 3.2 To ensure that students and the staff who support them are aware of the leave policy, we will introduce new **TGC 8.0.1** to require that ROs and providers ensure students and members of staff are aware of what leave is available to students and where this will (or will not) lead to an extension. In larger providers or grants, an appropriate way of achieving this is likely to be in having a well-publicised policy on leave and extensions. Providers or grants with much smaller numbers of students might instead have measures more proportionate to their scale.
- 3.3 Recognising that providers are ultimately responsible for the welfare of their students, a further change will make it explicit that a provider may supplement any of our provisions for leave with funds from other sources. If this provision is used, it is likely that the provider will arrange to continue providing a stipend from its own funding sources after the end of the UKRI Studentship. Under Additional Leave, we are also introducing Regulation Leave which will allow relevant providers further flexibility to draw funding from a UKRI grant with our explicit written permission.
- 3.4 We also discuss new requirements for good record keeping. Providers may need to give consideration to managing leave in a way that does not expose them to potential claims either of discrimination (under equality law) or that they have not treated students in a way that is sufficiently clear and transparent (under consumer law).
- 3.5 For students, there is a crucial link between the leave and an extension to their studentship. A third element – “how to manage the funding” – is of concern to ROs, relevant providers and to UKRI. If any *employee* takes a significant amount of time as (for example) sick or maternity leave, then that is to the employer’s cost and it would need to consider what measures to put in place to complete the employee’s work, whether that’s bringing in other staff, changing deadlines or modifying expectations around what work will be completed. There is no parallel for students, where if they take time off it is entirely to their own “cost”, in terms of reduced time to complete their degree. The UKRI EDI Caucus highlighted this issue as contributing to some students not taking leave when they need it initially, but eventually suffering from burnout and then taking more leave.
- 3.6 Later sections in this chapter then discuss further support while returning from leave, including phased returns and considerations for international students.

Annual leave

- 3.7 We are not proposing any changes to the TGCs in respect of annual leave.
- 3.8 In all forms of education students will, from time to time, need to or benefit from taking leave. Unlike taught courses where periods of leave are likely to be driven by term times and the need for students to take lessons, lectures or seminars together, much of postgraduate research training is driven by the needs of the student’s individual research project and wider training programme.
- 3.9 UKRI has long agreed with the principle that the students it funds should be provided with – and encouraged to take – annual leave. Rest is necessary for positive outcomes including the student’s mental health and increases the likelihood of successfully completing the

training. Under the regime, an RO may allow between 30 and 40 days' paid annual leave from study per year (pro rata), including bank holidays. Our general assumption is that an RO would specify an amount of leave available to all students within that range. As a year holds around 260 days excluding weekends, this potentially leaves 220 to 230 days to study for a full-time student each calendar year.

- 3.10 UKRI does not require ROs to record annual leave. In discussion with our OP we identified that over the last ten years a number of ROs have invested in systems that allow them to manage student progress, leave in general and annual leave specifically. Some of these operate in a similar manner to systems used for workers or school students, allowing students to request leave and for a supervisor to approve it. While we are not mandating it, we can see potential benefits to such systems and providers may consider whether such systems would be advantageous to them and their students in the future.

Family leave

- 3.11 UKRI provides funding for maternity, paternity or adoption leave. These changes leave the general provision of these types of leave broadly the same. However, we are making some technical changes to be clearer, changes to reflect updates in legislation on when workers can take paternity leave and being clearer on eligibility for leave for partners. We are also amending eligibility criteria to extend maternity leave to a mother where the leave will start during the funded period and introducing neonatal care leave.

Maternity leave

- 3.12 We have revised the text on maternity leave (**TGC 8.1.1**) to make this clearer and more consistent. There is no overall change to our policy on maternity leave.

Reflecting updates in legislation regarding when partner's or paternity leave may be taken

- 3.13 Under the Paternity Leave (Amendment) Regulations 2024, since 8 March 2024 the requirement (in England, Wales and Northern Ireland) for ordinary paternity leave for workers or employees to take place within 48 days of the birth of the child has been amended. The leave can now be taken at any point within 52 weeks of the child's birth. We are harmonising our support with this change and amend **TGC 8.1.2** such that ROs may draw funding from the grant for paternity leave for UKRI funded students at any point within 52 weeks of the child's birth, provided the other conditions are met.

- 3.14 We expect this change to have minimal impact with most partners likely to take paternity leave, as now, shortly after the birth of the child, but recognise that the change may still be beneficial in some circumstances.

Clarifying eligibility for partner's or paternity leave

- 3.15 The partner of the mother/birth parent is eligible for two weeks' leave on stipend. The existing TGCs refer to "Students who would be entitled to paternity leave under the statutory scheme" being eligible for paternity leave. We further state "In respect of birth parents, eligible students are those who will share primary responsibility for the child with its birth mother."
- 3.16 The statutory scheme for paternity leave is contained in The Paternity and Adoption Leave Regulations 2002 as amended. Under the legislation, an employee must satisfy all three of the following conditions:

- (a) *has been continuously employed for a period of not less than 26 weeks ending with the week immediately preceding the 14th week before the expected week of the child's birth;*

(b) is either—

(i) the father of the child or;

(ii) married to or the partner of the child's mother, but not the child's father;

(c) has, or expects to have—

(i) if he is the child's father, responsibility for the upbringing of the child;

(ii) if he is the mother's husband or partner but not the child's father, the main responsibility (apart from any responsibility of the mother) for the upbringing of the child.

- 3.17 The new **TGC 8.1.2** replaces the previous condition on paternity leave, stating that to be eligible the student should reflect (b) and (c) above, but not (a) as this is irrelevant for students. The proposed language in **TGC 8.1.2** more closely reflects the conditions that exist for employees but has been modified to align with the style of the TGCs and to reflect that a partner could be a married or civil partner of the mother, but that this is not a requirement to meet the definition of partner for the eligibility criteria. Other changes to the definition of partner reflect the slightly different definition in The Shared Parental Leave Regulations 2014, which also exclude a mother's older children from the definition of partner.
- 3.18 Our OP made a number of comments on the revised **TGC 8.1.2**. One was concerned that this indicated an expectation of increased monitoring; another suggested that there are examples where the student partner does not live with the birth mother/parent, or that the term "enduring" may be too subjective to apply or judge in practice. As these are all existing requirements, previously referred to and now quoted directly, we do not share these concerns but will reiterate in the Training Grant Guidance that these are broadly the same requirements as in employment.
- 3.19 We also considered comments about the name of this leave. On the one hand, it was felt that "paternity leave" excludes female partners. On the other, "paternity leave" remains in common use and is likely to be a search term used by some staff or students – omitting the term might make it harder for students to know the support is available. On balance, we believe the name "partner's or paternity leave" (leave for partners following the birth of a child) addresses both concerns.

Exploring options to enhance partner's or paternity leave

- 3.20 Advance HE noted that partners of mothers could receive unpaid leave after the birth of a child, but asked whether we could mirror pay for partners.
- 3.21 We have considered whether we can provide a system to reflect Shared Parental Leave (SPL). SPL is a statutory scheme established through the Shared Parental Leave Regulations 2014 and came into force in April 2015. Qualifying criteria include that, where sharing leave, both parents must be in employment. For a two-parent family, this means that where one parent is a doctoral student (who is not studying by virtue of an employment contract) neither will be eligible for Shared Parental Leave even if one of the parents is in full-time employment. As such we cannot offer statutory SPL.
- 3.22 We have also considered whether we can provide additional paternity leave (APL), which might have a similar effect to SPL without the ability to share. A number of employers already offer APL that is beyond the statutory minimum (CIPD, 2022) (Forbes, Birkett, & Smith, 2021). After careful consideration of the overall context and the associated cost, we are not introducing further APL. However, consistent with wider changes providers are able to offer funded APL at their own cost. If they have a scheme for their wider student body,

they may apply to us for consideration to be allowed to draw this cost from the grant under Regulation Leave (see below).

Adoption leave

- 3.23 We have updated the text on adoption leave to make it clearer and more consistent, but we have not substantively changed our policy.
- 3.24 Some OP members were concerned about whether they could identify whether the student was the main adopter. ROs should take a proportionate approach, in line with that used in already or in an employment context. We will ensure this is clear in the Training Grant Guidance.

Neonatal care

- 3.25 The Neonatal Care (Leave and Pay) Act 2023 will come into force in April 2025. It makes provision to extend leave and pay for working parents of premature babies in receipt of neonatal care. In addition to other parental leave entitlements, employed parents will be entitled to up to 12 weeks' leave when their baby requires over 7 days of neonatal care.
- 3.26 **TGC 8.1.4** is being introduced as per the Advance HE recommendation to entitle parents to up to 12 weeks' leave (one week for each week the baby is in neonatal care) under their normal stipend when their baby requires neonatal care. This is in addition to maternity leave and partner's or paternity leave. Applying Office for National Statistics data (ONS, 2024) to the UKRI funded student population and using statistics from Bliss (Bliss, n.d.), we estimate that around 40 UKRI students a year might use this new provision.

Returning to study immediately after childbirth

- 3.27 Advance HE asked us to consider whether it should be a UKRI requirement that a student does not work for the first two weeks after birth of a child. While very sympathetic, we note that the Equality Act 2010 states that, in a period of 26 weeks after the birth of a child, an education provider must not discriminate against a student by not providing education for the student. We therefore feel it would be inappropriate for UKRI to introduce this recommendation as in a very small number of cases it may provide a conflict for providers as to whether they comply with the law or a UKRI TGC.
- 3.28 UKRI currently provides for maternity leave and for continuing stipend payments during this period, we encourage eligible students to make use of this provision.

Where a birth is due after the funded period

- 3.29 The TGCs currently state that a student is eligible for maternity leave provided that the birth is due during the studentship. We are aware of at least two students where the birth of their child was expected shortly after the end date of the studentship. This can mean that a student is not eligible for maternity leave, even though that leave would have started before the end of the studentship.
- 3.30 The effect is that a student may be unable to take leave when they require it. This may be particularly pertinent where a student suffers from a long period of pregnancy-related illness. We are therefore amending **TGC 8.1.1** on maternity leave such that a student will be eligible if the maternity leave is planned to commence (or does commence) before the end of the studentship (defined as the funded period). This provides a reasonable level of support to enable a student to complete their degree. Note however that **TGC 6.1.3** states that the UKRI studentship should not be extended if the student has already completed their degree, as, under HERA, the purpose of UKRI funding is to support postgraduate training or our other statutory functions.



- 3.31 Maternity leave can begin up to 11 weeks before the expected week of childbirth. Students whose expected week of childbirth is more than 11 weeks after the end of the studentship and do not give birth during the studentship would remain ineligible for support from UKRI under the revised policy.
- 3.32 In an employment context, the government provides Maternity Allowance for mothers who have recently stopped working, or for some other reasons. It is our understanding that this benefit is not available to students or people who (as students) were recently unemployed. This means that a person who undertakes a doctorate and then becomes pregnant with a baby due after their funded period has ended is unlikely to be eligible for government support. Alongside our concern for the families who may be in this situation, we are also mindful that this may make it challenging for the individuals to enter the workforce and make use of their newly acquired skills. However, as this would be support that goes beyond support to complete the studentship it is not within our remit.
- In the event of a death of mother or baby*
- 3.33 The existing TGCs, in referring to the statutory scheme for employees, means that a person remains eligible in the event of the death of either the mother or the stillbirth of the child after 24 weeks. As a result of the above changes to **TGC 8.1**, we are introducing text to make this clear in **TGC 8.1.6** and **8.2.A.3**.

Medical leave

- 3.34 In light of Advance HE's recommendations and the EDI Caucus' findings we are replacing the previous provision for sick leave with new conditions on medical leave. The EDI Caucus further noted that there is confusion amongst students and staff about the leave that is available and underlined that some students will see their physical or mental health deteriorate further as a result of not taking (or not being able to take) leave. As well as the impact on the student, their prospects of successfully completing their studies can be reduced, undermining the investment that UKRI, their provider and the student have put into their training.
- Where medical leave can be used*
- 3.35 Advance HE recommended that UKRI consider making it clear that sick leave was available in a wider range of circumstances. We are replacing the provisions for sick leave with a broader provision for medical leave. This covers:
- Sick leave
 - Pregnancy-related illness
 - Antenatal appointments (where medically advised and not manageable through flexible study)
 - Fertility treatment (where medically advised)
 - Disability-related illness (including chronic illness)
 - Disability-related appointments, for example: diagnosis, therapy or treatment
 - Gender reassignment (where medically advised).
- 3.36 Some of these categories are related to the protected characteristics the Equality Act 2010 (and equivalent legislation in Northern Ireland) including, pregnancy and maternity, sex, disability and gender reassignment. We have included a reference to chronic illness as we appreciate that some people with chronic illnesses may not think of themselves as disabled, though in applying the TGCs, ROs should be conscious that a chronic illness could meet the legal definition for disability. In providing leave and any actions that they might take regarding students who have been on leave, ROs and providers will need to be conscious of the requirements this legislation places on them.

- 3.37 Some of our OP members asked us to consider whether medical appointments should be separate from medical leave. On the one hand, under our revised TGCs, a student whose health condition requires many appointments may feel that they reach the limit of medical leave with fewer days “off sick”. On the other, if we instead allowed appointments as a separate category of leave with its own limit, then a student whose health condition did not require appointments but more days off sick may feel that they had a lower limit for total time off than the other student. We are also concerned that having separate categories may make recording leave more complex, as the boundaries between a day off sick and a day for a medical appointment will not always be clear. On balance, we judge our approach as being the most equitable and simple way to provide support, but we are also considering whether additional time for appointments can, in some circumstances, be supported under our DSA Framework (see Chapter 5).
- 3.38 Our intent is that the provisions set out in **TGC 8.2.1** and **TGC 8.2.A.5** will be sufficient for ROs and providers to provide a reasonable degree of support to disabled students, with sufficient flexibility to manage the requirements of relevant equality legislation. The provision of more extensive leave is an anticipatory adjustment for disabled students, meaning they can access a reasonable level of leave without making an additional application. Nevertheless, we respect that in some circumstances where a student is advised that they will need a course of therapy with a high number of appointments, it may be helpful for them to discuss this with their RO and agree as part of a management plan. For this reason, **TGC 8.2.** allows for this.
- 3.39 We also note that time off for common, short illnesses (for example colds, stomach bugs) may use some of a student’s allocation of medical leave but would not normally result in an extension to the studentship. This is discussed in more detail under ‘Extensions and funding for leave’ below.

Requirements for medical evidence

- 3.40 Previously we required that students must be provided with sick leave where a medical certificate was provided. We are concerned that this could provide an insufficient level of support for students. Instead, **TGC 8.2.3** will require that the provider must be satisfied that the period of leave is necessary and reasonable. This revised provision reflects that:
- A provider can still request a medical certificate or other medical evidence, where this is a proportionate way to determine that a student’s need for leave is appropriate and this is consistent with the provider’s overall approach⁷.
 - It gives providers more flexibility to use a broader range of evidence, consistent with the Equality and Human Rights Commission’s latest advice note for the higher education sector (EHRC, 2024).
 - In particular, it should reassure providers that UKRI does not require repeated medical evidence for chronic conditions or disabilities. Having established to its satisfaction that a student has a chronic condition or is disabled, the provider can allow multiple periods of leave without the same level of medical evidence, as some already do.
 - For a period of sick leave where the sickness lasts for seven days or less⁸, a medical certificate has never been required and this continues to be the case.

⁷ In considering whether it is proportionate, an provider may need to bear in mind that a student can be charged by a GP surgery for providing a medical letter.

⁸ In this instance, the period of illness is 7 calendar days. The period of absence would likely be less, e.g. 5 days of study for a full-time student or 2.5 days for a student studying at 50% FTE.

- 3.41 Our OP members varied in their view of these changes; some felt that their organisation was already acting in line with this model, while others did not. One highlighted their organisation's policy to contrast with the UKRI change but, on inspection, it became clear that the organisation was already operating with the degree of flexibility we will be making clear in the TGCs. The move also reflects the judgement in appeal of *Bristol v Abrahart* (2024) and should reduce the burden on disabled students of having to frequently reaffirm their disability.
- 3.42 It is likely that providers with large numbers of students will require a policy on reviewing the use of medical leave (either periodically or at certain trigger points) to be satisfied that the leave is necessary and reasonable. There might be some parallels with human resource policy for employees, but (unlike employees) students cannot be made redundant. Providers should however be concerned with students' progress towards their degrees.
- 3.43 Advance HE recommended that we make specific reference to leave for pregnancy-related sickness; the changes here will make this provision explicit. We note that a pregnant student may require a period of sick leave followed immediately by a period of maternity leave in certain circumstances – such a student would potentially be entitled to 80 consecutive weeks of leave, though noting that under the terms of maternity leave no stipend is paid in the final period.
- 3.44 In providing leave, providers should be mindful of their duties under the Equality Act 2010 or equivalent legislation in Northern Ireland, and under the **TGC 3.4**, to not discriminate. We will consider whether we can provide further information on this in the Training Grant Guidance, particularly that providers should ensure they do not indirectly discriminate, for example, against a student who was on medical leave, where that medical leave was related to a protected characteristic.

Length of medical leave

- 3.45 When Advance HE considered UKRI's provision of sick leave it also asked us to consider extending available leave sick leave from 13 to 28 weeks. Under UK law, employees are currently entitled to 28 weeks sick pay. We are happy to accept the recommendation to extend medical leave to 28 weeks within a rolling 12-month period. In doing so, we recognise that some illnesses will naturally last more than the current 13 weeks.
- 3.46 The total amount of medical leave will be restricted to 52 weeks across the whole studentship. Some OP members asked whether UKRI would be open to providing more than 52 weeks medical leave. We have considered this carefully and will maintain the limit at 52 weeks. On balance, we think it is reasonable to limit our support in this way, as:
- Unlike other qualifications, a doctoral candidate must be able to demonstrate a novel contribution to research, or a novel application of research (QAA, 2020, p. 16). There is a risk that if a studentship is extended too far then the student's research is substantially overtaken and it becomes difficult or impossible to obtain the qualification. In such circumstances, where a student has already taken significant time away from study and this is likely to continue, continuation of the studentship is unlikely to be in the student's interest.
 - UKRI's role in funding postgraduate research training is derived from HERA, which makes clear that the funding is for the purpose of supporting research. At a point where continued support is not in line with our functions as set out in the act it is the responsibility of others (including government) to determine what support is appropriate. In our view 12 months' medical leave over the training period strikes a balanced position.
 - There is a cost in extending doctoral training, including to the student themselves.

Students are not generally remunerated (that is, unless subject to an employment contract) and unlikely to be accruing a pension or other benefits for the duration of their study. Extending the time of study may reduce their lifetime earning potential or entitlements to state benefits such as the state pension which relies on the number of years of National Insurance contributions. While we assume most students are content to balance the cost of study with their future potential earnings, unexpected extensions might change this balance.

3.47 This may have implications for how a provider translates the limit into its own regulations, for instance, it may want to ensure that some medical leave is available to the student in the final stages of their studentship, including in the extension period.

3.48 Note that, we have removed the previous requirement that a studentship must be suspended once a student has been on sick leave for 13 weeks, reflecting wider changes to the TGCs that give ROs more flexibility. ROs may need to consider their own approach for when a student has used their full allocation of medical leave.

3.49 Following engagement with the OP, we wish to emphasise that there is no requirement from UKRI that medical leave be taken in a single block. For example, the Open University's Research Degree Regulations allow PGR students with disabilities (including chronic conditions) to take multiple, short periods of leave which then accrue into an extension:

'Accrued study breaks can be used as a reasonable adjustment where the student has registered a disability or long-term health condition with the University or is a registered carer. Such requests should be submitted upon accrual of one month of disrupted time.' (OU, 2024)

3.50 The OU is one of the providers that has put in place a software solution to help record and manage PGR student leave, partly with this scheme in mind. Though it is not an explicit requirement, we encourage providers to consider how best to use medical leave to support their students.

3.51 Extrapolating from national statistics from the Department of Work and Pensions gives some indication of how many students might benefit from allowing 28 weeks of medical leave in a rolling 12-month period. We assume similar levels of long-term sick leave used by working people are required for students' medical leave⁹. On this basis the support would cover full medical leave requirements for an additional 166 students a year. In addition, it would contribute to the sick leave for a further 99 students who would be likely to need to take more than the full allowance of medical leave in a year.

3.52 As set out in new **TGC 8.0.3** an RO may supplement this leave from its own or other resources if it deems it appropriate to do so.

Additional leave

3.53 Events or circumstances a student encounters during their studentship could require them to take leave to ensure they can complete their studies. We want doctoral programmes and students' research projects to provide sufficient flexibility and a supportive environment to accommodate them. Some requirements can be supported through flexible study practices while others will need additional support allowing a student to take leave. We are therefore

⁹ We recognise that there will be differences, for example, higher levels of neurodivergence in the student population compared to the wider population, or lower levels of COPD amongst students, for example. Nevertheless, the DWP data provides a reasonable estimate for our purposes.

introducing Additional Leave, which represents a number of different scenarios that would allow a stipend to be drawn in respect of:

- Special leave (including bereavement and pregnancy loss) and emergency situations such as serious illness or injury of a student's dependant or situations at home, such as flooding
- Baby loss
- Carers leave
- Additional disability leave associated with delayed adjustments
- Health and safety leave
- Public duties
- Regulation leave

Special leave (including bereavement and pregnancy loss)

- 3.54 Previously the TGCs required that an RO have a policy in place to support short-term time off for emergencies and compassionate leave. We have replaced this with the new provision in **TGC 8.2.A.2** on special leave. This states that, typically, a stipend may be drawn for up to 5 days' leave pro rata but that at your discretion you may decide to provide up to 10 days' paid leave pro rata.
- 3.55 Some of our OP members noted that this may be less generous than the current system where they might have allowed more than 10 days' (that is, two weeks') compassionate leave, for example, for an international student who needs to return to their home country. On the whole our view is that where a student needs more than two weeks, this is unlikely to be on compassionate grounds, and more likely to be health related (requiring medical leave), or a more flexible study option might be adopted instead. We are considering the appropriate guidance on this issue with an intention to publish this in April 2025. ROs that explicitly allow longer allocations of compassionate leave can either fund this from other sources or apply to fund this for UKRI students from the UKRI grant through regulation leave (see below).

Baby loss

- 3.56 the introduction of **TGC 8.2.A.3** is a clarification of existing rules. The previous TGCs referred to maternity and paternity leave provisions that were provided on the same basis as statutory schemes for employees. The effect was that students who suffered the loss of a baby could still receive maternity and partner's or paternity leave. Having amended the TGCs as set out above, we are now making this explicit.

Carer's leave

- 3.57 In **TGC 8.2.A.4** we are providing up to 5 days a year as carer's leave, to be used for adult caring responsibilities. ROs that explicitly allow longer allocations of carer's leave can either fund this from other sources or apply to fund this for UKRI students from the UKRI grant through regulation leave (see below).

Additional disability leave associated with delayed adjustments

- 3.58 Wider student data indicates that in many cases reasonable adjustments for disabled students are not put in place swiftly, even when the provider agrees with a needs assessment that they should be. Providers will be mindful of their duties under equality legislation and UKRI **TGC 3.4** in these circumstances.
- 3.59 In some cases, where adjustments are not put in place swiftly and the student cannot continue with any study, it may be appropriate to allow the student additional leave and provide an extension, as set out in **TGC 8.2.A.5**. We will issue additional guidance on the

use of this leave type, reflecting that extensions come at a cost to disabled students as well as to funders, and that allowing a student to take leave may not be sufficient for the provider to meet its obligations to provide reasonable adjustments.

- 3.60 The reasonable adjustments process is more appropriate to consider where the period of study may need to be extended over that available through medical and additional leave. For example, to reflect a known need for a high volume of routine medical appointments or continued need for non-medical appointments (see **TGC 3.4.3**). We will consider providing guidance to this effect in April 2025.

Health and safety leave

- 3.61 As with the additional disability leave discussed in paragraph 3.58 and 3.59, there may be circumstances in which health and safety issues mean that a student cannot study at all on a temporary basis. **TGC 8.2.A.6** provides the student with one additional avenue for support, while not necessarily mitigating the RO's obligations to provide a safe environment to study.

Public duties

- 3.62 **TGC 8.2.A.7** is principally support for unavoidable public duties, such as jury service. UKRI would not normally support additional public duties such as elected offices, school governors and such like. Students would instead be expected to study around any such commitments.

Regulation leave

- 3.63 Conversations with our OP indicated that some providers may have leave types or allowances that are not covered by our conditions. We have stated elsewhere that providers can provide such leave at their own cost, but we are aware that this can present its own issues. To give some flexibility and to ensure that we support providers in supporting their students, we are introducing a new category of Regulation Leave in **TGC 8.2.A.8**.
- 3.64 If a provider offers support for students under its university regulations or equivalent (for example, a policy on leave for PGR students) that is not otherwise covered by the TGCs, the provider will be able to apply to UKRI for permission to fund this for UKRI students from any relevant training grants. UKRI will consider requests on a provider-by-provider basis. Guidance on how to apply will be set out in April 2025 with decisions on the first applications expected to be made before October 2025. The process is expected to support providers that have taken a considered approach to student support, not to make decisions for individual student cases.
- 3.65 Our expectation is that we will have covered the majority of leave types and allowances already and that we will have only relatively few requests under this rule. Nevertheless, the intent of this policy is that providers will have space to think creatively about how they support their students and, if we receive a high number of requests or there are clear issues with our provision, ensure that we can consider how to best reflect these in our wider policy.

Recording of leave

- 3.66 It is clear from our discussions with the OP that models for managing leave vary significantly. A number of respondents suggested that over the course of a training programme, students may have some structured hours in lab or facility space, but might otherwise have considerable freedom on when and how to study and the provider might monitor leave via an end-of-year survey of students and/or supervisors. Others felt that

recording leave (including, in some cases, annual leave) in near real-time, with a system akin to that used for employees but developed specifically for PGR, was crucial for the wellbeing of the student.

3.67 We are not specifying how a provider should manage leave, but new **TGC 8.0.4** requires that providers will ensure accurate records of medical, family and additional leave are maintained and reviewed periodically. The method of review may vary in different research settings, but overall we expect providers (perhaps at grant or department level) to proactively monitor student leave and ensure that it is being used appropriately. Of particular relevance:

- Medical leave should be monitored to ensure that the student’s need is genuine and the most appropriate way of supporting the student. Care should be paid to high instances of, for example, medical leave in relation to mental health. It has been UKRI’s expectation that providers have provision in place to support students’ mental health since 2018 and this was restated in the Statement of Expectations for Doctoral Training (UKRI, 2024).
- When monitoring medical leave, ROs should be mindful that while initially medical leave may not constitute a disability, if a physical or mental impairment lasts more than a year and puts the student at a substantial disadvantage then, under the terms of the Equality Act 2010 and equivalent legislation in Northern Ireland, it is likely to constitute a disability. ROs should also be mindful that the student may not consider their health condition as a disability but may still rely on the protection of the act at a later date.
- When monitoring both additional disability leave associated with delayed adjustments and health and safety leave, providers should be mindful that we are making it a requirement of the training grant that there is a policy to support reasonable adjustments for disabled students (**TGC 3.4.3**) and it is an existing requirement that they address health and safety issues (**TGC 3.3**). While leave potentially provides a student with stopgap support, it does not relieve ROs or providers of their wider obligations under those TGCs or their legal and regulatory responsibilities.
- Any leave related to pregnancy (including pregnancy-related illness) may need to be recorded separately as pregnancy is a protected characteristic in equality legislation. As well as being a statutory requirement, it is a requirement that training grant providers must ensure that they do not discriminate against students, as set out in **TGC 3.4**.
- Gender reassignment is a protected characteristic in legislation and hence providers will need to take steps to ensure that they do not discriminate against people on this basis. Providers will also be aware that, in addition to the usual data protection considerations, Section 22 of the Gender Recognition Act 2004 restricts how knowledge about gender reassignment can be passed on by anyone who has acquired this information in an official capacity.

3.68 Some OP members noted that providers – if they do not record leave already – will have to consider their processes carefully. We are not proscribing how providers record leave, but felt it may be helpful for providers looking at their processes to consider these issues:

‘...there may be a request for confidentiality from a student regarding medical matters and, in particular, they may not wish details to be shared with supervisors (this has happened) or more widely.’

‘Regarding record-keeping: need time to implement safeguards to ensure that maintaining separate records does not lead to discrimination or bias. The actual implementation of this consideration must be closely monitored to

ensure that it effectively prevents discrimination. Training for staff involved in academic progression and absence reviews should include sensitivity and awareness training related to disability and chronic illness.'

- 3.69 One OP member asked whether it was acceptable for students to have medical appointments and to not record them as leave. We recognise that many of us will occasionally need GP, antenatal or other medical appointments, and will arrange our work or study around them. These normal occurrences are unlikely to put a student at any substantial disadvantage. In many cases the student is likely to be able to judge whether they need leave for their appointment. However, if the student starts to require more regular medical support then leave or an extension might be required to mitigate the disadvantage. Provider staff may need to be mindful that it could be risky to discourage recording of appointments if records are required by the provider to mitigate the risk of discrimination or to ensure the student is treated fairly. In these cases it is important that project leads check all providers in their grant have systems in place that can support students, being particularly mindful of the requirements in **TGC 3.4**.

Part-time students and limits on leave

- 3.70 We have considered how to apply time limits on part-time students.
- 3.71 For part-time workers, leave would be pro-rated. For example, if a full-time worker received 26 days leave a year, then a worker working 50% full-time equivalent (FTE) might expect 13 days. As students are not contracted to work a specific number of hours or days in the same way as workers, many providers do not manage leave for students in this way.
- 3.72 Broadly we have specified leave in calendar periods. For example, for 28 weeks medical leave:
- A student studying 100% FTE on a pattern of five study days a week would effectively be able to take 140 days medical leave over 28 weeks.
 - A student studying 50% FTE on a pattern of 2.5 days a week would effectively be able to take 70 days leave over the same 28 weeks.
- 3.73 Medical leave is also limited to 52 weeks across the whole studentship. This means that for a four year course:
- A student studying 100% FTE on a pattern of five days a week would effectively have a maximum of 260 days' medical leave over 4 years (5 years with a year's extension – see below).
 - A student studying 50% FTE on a pattern of five days a week would effectively have a maximum of 130 days' medical leave over 8 years (9 years with the extension – see below).
- 3.74 This position reflects that reasoning set out under 'Length of medical leave' above. Allowing a longer limit for part-time students might mean an extension of more than one year, with increasing risks for the likelihood of the student being able to complete, financial risk for them, the RO and UKRI. Nevertheless, there may be cases where a needs assessment judges that a disabled student needs additional time and that this is reasonable. This is an area that requires further consideration, as discussed in Chapter 5.

Extensions and funding for leave

- 3.75 In the following paragraphs we discuss a number of different arrangements that may be required to support the extension of individual studentships. Advance HE was concerned

that, without clarity, some providers may not extend support to UKRI funded students. This appears to be borne out in the experience of some of the students who spoke to the EDI Caucus. We wish to make it clear that the individual students must receive the leave that they are entitled to and have incorporated this into **TGC 8.4.2**. Whether periods of leave are then supported by an extension to the overall duration of the studentship is the subject of this section.

Extensions to UKRI studentships

- 3.76 In this section we are primarily concerned with extensions to UKRI studentships, meaning the period for which funding can be drawn from a UKRI grant to pay for a specific student's stipend, fee and other costs. It is this period to which our TGCs principally relate. Hence in this policy statement we are not directly concerned with providers' own rules on students' expected submission dates, maximum periods of registration or other provider rules on registration. We accept that a providers' approach to these dates might be informed by our TGCs, for example, because an extension to the UKRI studentship might necessitate a change to the expected submission date. However, given the variety of practices across the sector we expect providers to make their own judgements about how to ensure their rules support our TGCs for UKRI funded students. The focus of this review has not been on submission rates but we will continue to consider the interaction between the UKRI funded period, additional time allowed by providers and the impact this has on completion rates, research culture and EDI.
- 3.77 The conditions where an UKRI studentship may be extended are set out in **TGC 6**. Currently our rules state that the studentship must be extended in relation to a period of absence for maternity leave, ordinary paternity leave, adoption leave, unpaid parental leave, absences covered by a medical certificate and extended jury service. Given the changes set out in the section above, we are substantially redrafting this section.
- 3.78 The implication of the previous rule is that an extension must be provided if, for example, a student has a medical certificate covering an illness over a week. In reality, we understand that (with the exception of paternity leave) most providers have not provided an extension for anything less than one month. We are therefore amending our requirements such that **TGC 6.1.1** states that an extension "may" be provided for any period over one week and "must" be extended for a period of leave over one month, meaning our rules more closely reflect existing practice within providers, while still allowing for shorter extensions.
- 3.79 We also state that decisions to extend a studentship due to medical leave should be informed by the impact of the timing and duration of the absence on the student's ability to complete their studies within the current funded period. An OP member noted that it was unclear how their decisions might be informed by the impact of the timing and duration of absence in a way that is consistent. Nonetheless, we think it is important that providers have some flexibility to reflect that a short absence during a crucial week of experiment or observation might be more impactful than a slightly longer period at a different stage. It also means that the length of extension given is likely to need consideration of the impact and not necessarily be tied to the actual period of leave. Overall a provider's approach to extensions is likely to be governed by the need to comply with other regulatory requirements, including consumer law (the need to treat students fairly and transparently) and equality law (the duty to not discriminate).
- 3.80 It also reflects that, on the whole, extensions should not be provided for sick leave for colds, stomach bugs or other illnesses that we might all normally expect to experience from time to time, and research projects and teaching should be planned on the assumption that we are all likely to require some small amount of medical leave, just as they should be planned such that students can use annual leave.



- 3.81 As currently, extensions cannot be provided where the student has already submitted their thesis or equivalent or where the student is no longer registered with a provider.
- 3.82 The revised **TGC 6.1** will give ROs licence to extend a studentship without recourse to the awarding council, where the following conditions are met:
- The total extension must not be more than one calendar year (this also applies to part-time students) unless the extension is due to either a period of family leave (such as maternity leave), honouring a commitment to leave related to the Covid-19 pandemic (see Chapter 6), or due to adjustments potentially allowable through UKRI's DSA Framework (see Chapter 5). Where the adjustment would be a reasonable adjustment under the terms of the Equality Act 2010 or DDA, we would seek to handle that through Training Grant Guidance on reasonable adjustments. In some instances councils also manage internships or placements through extensions as will be reflected in specific grant conditions. We will no longer consider requests to extend studentships beyond one calendar year outside of these exceptions.
 - The end date of the studentship is within the end date of the grant. Where the studentship would be due to end after the grant, the RO will need to seek permission (through a grant maintenance request) to extend the training grant, so that we can ensure the appropriate financial arrangements are put in place, as described in the section below. Upon considering the grant maintenance request, we may advise the RO of alternative arrangements such as transferring the remainder of the studentship to another training grant.
- 3.83 The rules have a bearing for part-time students. The maximum extension for a part-time student is also one calendar year. For example, for a 4 year course:
- A student studying at 100% FTE might receive a year's extension, taking their total funded period from 4 years, to 5 years.
 - A student studying at 75% FTE might receive a year's extension, taking their total funded period from 5 years and 4 months, to 6 years and 4 months.
 - A student studying at 50% FTE might receive a year's extension, taking their total funded period from 8 years, to 9 years.

Funding

- 3.84 Currently **TGC 8.4** reads: "additional costs arising from a period of genuine absence in the event that there are insufficient funds in Your Training Account to meet these costs. You must demonstrate a lack of flexibility to meet these costs and an absence of other contingency funding or concurrent Training Grants from which You can draw in order to meet these costs. You may request these costs when completing the Final Expenditure Statement for the Training Grant."
- 3.85 Mechanisms to cover absence costs include, in order of preference:
- (a) Using funds within the grant, even where this was not its original purpose. Though practice varies by awarding council, it is not uncommon for a UKRI training grant to have sufficient funding to support leave and project leads can use this flexibility. In some instances this may mean transferring funds between fund headings, as allowed under **TGC 4.10** (unchanged). Grant holders may be able to identify underspend and some grants have flexibility on the number of students recruited to future cohorts within the grant (see **TGC 2.10** (unchanged)). This is particularly the case on larger, multi-year grants where there is more likely to be underspend and funding the leave in this way does not impact on the length or overall budget or length of the grant.



- (b) Move the student(s) onto another grant, where available. Some ROs will receive successive training grants. Moving the student to a newer grant allows uninterrupted continuation of study for the student, while the RO and UKRI can perform the financial reconciliation of the earlier grant (see **TGC 2.10** (clause unchanged)).
- (c) Extending the grant. Where the other options are not available, UKRI may, in some instances, extend the grant, allowing the student's funding to be extended too. Extending a training grant may be a less desirable option for UKRI or ROs as it can mean that reconciliation of the grant can be moved into later financial years.
- 3.86 The revised **TGC 8.4** will make clear that the RO must inform us if, having reviewed the budget, support cannot be provided. This requirement aims to ensure that students are not prevented from taking leave because of incorrect assumptions about the options available and to address Advance HE's concerns that students are not getting support because of a lack of clarity.

Co-funding

- 3.87 In addition to these changes, we are also introducing **TGC 8.4.1** on co-funding arrangements. One of the consequences of students requiring additional leave or time can be that an individual studentship can have a higher cost than might be otherwise be the case. While UKRI is happy to support these costs, ROs should bear in mind that these costs need to fall equitably across different funder types and should be clear on how such costs can be met. For these purposes, a co-funder might be the provider or a third party, such as a business.
- 3.88 Many OP members noted that their existing collaboration agreements do not make provision for the additional cost of leave outlined in this statement. While we believe most regular third-party funders are likely to accept that they should contribute to the wider costs of supporting students when they are unwell, we recognise that it is unlikely to be possible to amend existing agreements for the start of the 2025-26 academic year. Therefore, **TGC 8.4.1** requires that new co-funding agreements for students starting from AY 2026-27 must have regard to meeting commitments to diverse student needs, including leave and extensions.

“Retrospective” leave

- 3.89 A number of our OP members asked whether leave could be taken retrospectively. We have generally avoided using the term “retrospective” as we are aware it will have different meanings in different contexts. However we note the following TGCs are relevant:
- A student must not be expected to study during leave absences (**TGC 8.0.1**)
 - A student's need for leave must be genuine (see requirements through **TGC 8**)
 - Providers must maintain a record of leave (**TGC 8.0.4**)
- 3.90 Provided these and any other relevant requirements are met, UKRI is content to fund the leave. In effect we anticipate that record keeping will need to be timely in order for the RO to provide assurance that the student's need for leave is genuine, and that they have not been working during that period. In the example cited above, the Open University requires than for an application for an extension following leave to be valid the application must be made after one month of leave has been accrued. This example may be useful to others.
- 3.91 Note that the new rules will only apply from the start of the 2025-26 academic year. We will not fund extensions for leave which students would have taken in 2024-25 or earlier if the new rules had applied then. As the new TGCs extend the existing ones, no student who

took leave under the old framework should be disadvantaged under the new framework. We will also continue to honour the rules introduced during the Covid-19 pandemic (see Chapter 6).

- 3.92 UKRI will not fund leave or an extension for a studentship that has already ended.

Further support while on or returning from leave

- 3.93 Advance HE recommended that we set the expectation that students should be able to access certain provider facilities and support while on medical leave, noting that this support could result in a shorter period of medical leave being taken, particularly with regards to mental health. Advance HE also suggested that we outline the need to provide support on return from long-term absence, including whether there is a need for the student to seek support from student wellbeing and disability services. Its recommendation stems from a concern that, if a student has no access to these facilities, then the student may take longer to recover and underlying issues may be unresolved.

- 3.94 We agree with Advance HE's recommendation that it is incumbent on ROs and providers to support students during their absence or leave. We are therefore introducing **TGC 8.3.2.1**, stating we expect that a policy is in place to provide wider support mechanisms for students returning to study after a period of leave.

Financial support while a student is on leave

- 3.95 We have set out where a stipend may be drawn from the grant during periods of leave. We are also providing clarity on when a fee may be drawn.
- 3.96 As a point of principle UKRI generally expects that ROs will treat UKRI funded students in the same way as non-UKRI funded students. Where a self-funded student requires a period of absence, they are likely to request an interruption or suspension of studies. During that period the self-funded student is unlikely to be paying fees and there is an argument that this should apply to UKRI studentships too. However, we also recognise the need to reflect that a self-funded student does not necessarily have a studentship in the same way as a UKRI studentship.
- 3.97 We are also conscious that across higher education sector, the words "suspension" and "interruption" are used in subtly different ways. For example, HESA requires that ROs report on "suspension of active studies" (HESA, 2022) – this is not necessarily the same as suspension of the studentship (that is, our funding) or the overall training grant.
- 3.98 Broadly, when a UKRI student is on leave consistent with **TGC 8**, we are content for an RO to take a pragmatic approach and to suspend the student but not to suspend the UKRI studentship, so long as the student maintains access to the university campus and student support services throughout a period of leave. This is set out in **TGC 8.4.2**.
- 3.99 We are considering whether we need to include further information in the Training Grant Guidance on what student support services may include, but these are likely to be access to student services, disability services, email, the ability to return books to libraries and, where applicable, access to campus. The result should be that a fee and stipend continue to be drawn from the grant during periods of leave specified above, and that the student's access to facilities is maintained throughout the period. Our cost benefit analysis in Chapter 7 has been modelled on this basis. We will, however, keep this position under review and may modify if we make further changes following planned work to review the full economic cost of postgraduate research.
- 3.100 We recognise that there is a risk that if a student continues to access some facilities while on leave, they may be under real or perceived pressure to continue to study despite being



on a period of leave. We have sought to mitigate this risk through the requirement to comply with equality legislation (**TGC 3.4**), to allow extensions (**TGC 6**), by requiring that a student should not be expected to study while on leave and by requiring that the RO ensures periods of leave are genuinely needed (**TGC 8.0.1**). We would encourage providers to consider whether there are further steps they can take to ensure a culture of studying over periods of leave does not take hold.

Phased return to study

- 3.101 UKRI Training Grant Guidance has for some time included a reference to phased return to study, suggesting a period of four weeks phased return be allowed in relation to ill health. We are moving the reference to phased return to study to new **TGC 8.3.2**. We will remove the guidance that this only be used in relation to ill health, meaning that the provider may allow it in relation to return from any period of medical, family or additional leave.
- 3.102 The current UKRI guidance suggests that a phased return should be no longer than four weeks. ACAS advise that in employment it is common for phased return to be taken in periods of four weeks, reviewed and extendable every four weeks. While students are not employees, this practice is likely to be beneficial to research students. In April 2025 we will amend the Training Grant Guidance to reflect this.
- 3.103 We expect a student to receive their normal stipend during a period of phased return. However it would normally be accounted for from a period of leave, for example medical, additional, family or annual leave, as appropriate.
- 3.104 Some of our OP members indicated that they do not monitor annual leave in their organisation. For students who have been on a long-period of leave – which are likely to be those who would benefit from a phased return – a relatively simple calculation to help determine how much leave they have accrued will be acceptable. For example, a student who has been on sick leave for 24 weeks who would normally have 30 days' annual leave will have accrued 15 days' annual leave while away. 10 days of this leave would support a 50% return to work over four weeks. For those who require a phased return following a shorter period, consideration should be given to whether other leave types could be utilised, such as medical leave. We will consider updating the Training Grant Guidance to this effect in April 2025.
- 3.105 Some OP members also asked whether a stipend should be pro-rated during a period of phased return. We confirm that no deductions should be made from the stipend. We believe that should be clear in the rules, but will consider providing guidance on this in April 2025.
- 3.106 The current guidance states that phased return should not be used where a part-time mode of study is more appropriate. Advance HE had therefore recommended that UKRI provides guidance on where to use part-time modes of study rather than phased returns. Given the changes described above we will remove the reference to part-time modes of study. Our approach to modes of study is set out in Chapter 4.

International students

- 3.107 While home students, where supported by their provider, will be able to take full advantage of UKRI's support for leave, international students are required to comply with the conditions of their visa and providers with the requirements on them as sponsors. The rules on visas are set by UK Home Office. Currently this means that international students may be limited in how much leave they may take without returning to their home country.

Chapter 4: Modes of study and flexible study

- 4.1 Advance HE recommended that UKRI highlight a broader range of flexible study options within the TGCs and that we recognise students may need flexibility for a range of reasons such as caring responsibilities, a fluctuating health condition, wanting to change their caring commitments or a change in employment status. We asked the EDI Caucus to explore some of these issues and its report provides some more detail why students might move to part-time modes of study:

‘...part-time study is not necessarily the most appropriate adjustment for all doctoral students, not least because such a shift in mode of study variously compromises the student in terms of finances, but often also in terms of stalling career progression. Nevertheless, many doctoral students started or switched to part-time studies due to various reasons, such as managing health conditions, engaging in internships, making childcare arrangements that best suit often tight or impossible budgets, or other caring responsibilities, and the need for additional work to cover living costs and other personal circumstances.’
(Richards, et al., 2024, p. 30)

- 4.2 One barrier to changing mode highlighted by EDI Caucus was UKRI’s requirement that a student only change mode of study once during their studentship. A number of students in their focus groups highlighted this as potentially restrictive, including one student who was offered a role providing a public service following an internship, which they could accept if they went part-time, but that would then cause them difficulties following that project’s end (Richards, et al., 2024, p. 34).
- 4.3 Advance HE had also advised that we reflect current employment practice of allowing two requests to change mode of study each year. After careful consideration we are proposing to remove the restriction on the number of times that a student may change mode of study in **TGC 7.1.1**. We do not expect that this change will lead to many multiple requests and, even where there are, we do not expect ROs to approve every request. One OP member indicated that many providers have regulations around maximum periods of registration that might limit how many times a student can switch a mode of study. We have no objection to any such regulation so long as it is consistent with the provider’s wider legal and regulatory obligations. Rather, the change in our TGCs mean that, when considering a request from a student, the provider will be able to more freely decide whether a change in mode of study is in the best interest of supporting the student. In doing so, the provider may need to take account of **TGC 2.19**, notably the need to communicate the terms of the change clearly and to treat the student fairly.
- 4.4 The new **TGC 7.1.1** states that “You must be able to demonstrate that you have treated students who change mode of study in a way that is transparent and fair.” One OP member felt that there may be a conflict of interest and so an appeals route should be prominent if a student feels they would benefit from a change in in mode but the RO refuses this. This is now covered in **TGC 2.19** on consumer law. Providers will be mindful that under consumer law, “A term in a consumer contract is unfair if, contrary to the requirement of good faith, it causes a significant imbalance in the parties’ rights and obligations under the contract, to the detriment of the consumer” (CMA, 2015). We have also set out our expectation that providers have good processes for raising issues and resolving complaints, again an important element of complying with consumer law.
- 4.5 The current TGCs state that an RO must not approve a change of the mode of study for health reasons unless medical evidence indicates that part-time study is feasible and full-time study is not. This rule reflected concern that students may be pushed or persuaded to move to a part-time mode of study when other interventions might be more appropriate. As

the EDI Caucus highlighted in its report, change in mode of study is not necessarily the most appropriate adjustment, Advance HE did however recommend that we recognise that students themselves may wish to change their mode of study because of a health reason whether or not it is recommended by a health professional. Instead of requiring evidence from a health professional, it suggested that we work with providers to ensure that all possible reasonable adjustments have been explored, in consultation with the student, before a change in mode of study is advised.

- 4.6 We have broadly accepted this recommendation. **TGC 7.1.1** has been amended to remove the reference to health reasons or medical evidence. Changes to **TGC 3.4.3** discussed in Chapter 2 require that a provider has a policy that enables it to put in place reasonable adjustments and **TGC 3.4.5** that students are made aware of the availability of adjustments at the earliest opportunity. Proposed changes to leave (Chapter 3) and the UKRI Disabled Students' Allowance Framework (Chapter 5) should mitigate the risk of a student being pushed to a part-time mode of study where this is not in their overall interest.
- 4.7 Advance HE also noted that we required that a change in mode of study not be approved in the final six months unless in exceptional circumstances and recommended that we set out what might constitute exceptional circumstances. We are instead removing the requirement around approvals in the final six months from the TGCs. These changes give providers flexibility to approve part-time modes of study where, in its judgement, this is reasonable. Instead, following advice from our OP, we will issue further guidance as part of an update in April 2025 that a state a change in mode of study where the main purpose is to either (i) push back the submission deadline, and/or (ii) where the student intends to continue studying at the same pace, are not reasonable.
- 4.8 Advance HE also recommended that we provide examples of where changes to mode of study might be appropriate. On balance, we do not believe that UKRI is well placed to advise whether an individual student would be better on a part-time or full-time mode of study, but we have set out the expectation that the provider can demonstrate that a student has been treated in a way that is transparent and fair. However, we noted in our response to the call for input (UKRI, 2023) that there is significant variation between disciplines and providers in how many students are part-time. We would like to invite feedback on what might be causing these differences.

Support for part-time students

- 4.9 The EDI Caucus highlighted cases where students reported their provider offered them less support as a part-time student compared to a full-time student. While it is acceptable for some differing treatment of students on different modes of study (for example, by pro-rating stipends), particularly where choice on mode of study may be influenced by a protected characteristic, providers should take particular care to ensure that different treatment does not constitute either direct discrimination or indirect discrimination for the purposes of the Equality Act 2010 and equivalent legislation in Northern Ireland. Examples the EDI Caucus found included "reduced access to physical resources, less integration into the academic community, inadequate administrative support, and insufficient adjustments for disabled, neurodivergent, and deaf students" (Richards, et al., 2024, p. 41). A final amendment to **TGC 7.1.1** reflects the need to avoid discrimination when providing different modes of study.

Less than 50% FTE as a reasonable adjustment for disabled students

- 4.10 **TGC 5.3** currently restricts FTE to at least 50% of full-time equivalent. The provision exists to ensure that students complete in a timely fashion. Unlike other qualifications, the requirement of research training to provide novel research, or the novel application of research, means that there is a risk that a student's research stops being novel (QAA,



n.d.). We also want to ensure that there is a return on our investment in students in a timely manner. As set out above, being a student comes at some short-term cost to the individual.

- 4.11 Advance HE recommended that we work with providers to understand whether a student could study for less than 50% of the FTE at points in time and the implications of this for the registration period, research relevance and if there are particular barriers for some research disciplines. We recognise that there may be circumstances where a lower FTE – for example, studying 2 days a week rather than 2.5, may (perhaps in combination with other adjustments) be a reasonable adjustment for a disabled student, though there are equally circumstances where it will still not be reasonable.
- 4.12 The OP asked whether we would consider setting a limit on how low FTE could be. We have considered this, and are not going to set a numerical limit, but consider that the “reasonable” test is sufficient limit.
- 4.13 Where a RO determines that less than 50% FTE is reasonable, including that the student remains reasonably likely to succeed in the qualification, we are content to support the RO and the student with our funding. We have revised **TGC 5.3** to make this change.

Other options for flexible study

- 4.14 **TGC 5.3** was amended in November 2023 to reflect that students are able to request changes including working compressed hours, studying from home and flexitime. UKRI has not made it a requirement that the RO must agree a request; this remains at their discretion. However, we would highlight the requirements of equality legislation, particularly the need to pay due regard to eliminating discrimination.

Chapter 5: Disabled Students' Allowance & reasonable adjustments

- 5.1 In Chapter 2 we discussed creating greater clarity that the onus on managing students' rights, including those under the Equality Act 2010 and equivalent legislation in Northern Ireland, rests with providers. In Chapter 3 we discussed issues around leave and giving providers greater flexibility to be able to support students, including through the use of medical leave and additional leave for disabled students. In this chapter we discuss two other key elements of support for disabled students.
- 5.2 We outline proposed changes to UKRI's Disabled Students' Allowance (DSA) Framework, which allows providers to recoup costs for providing reasonable adjustments to UKRI funded students. We do not currently hold central records on how many UKRI students receive DSA, but our analysis of data from the Student Loans Company (SLC) and HESA indicates that around 80% of disabled undergraduates receive DSA under that scheme. The measures discussed in this chapter seek to better align with SLC DSA in some respects and we are additionally considering steps to ensure that provider disability offices are better acquainted with the revised UKRI scheme.
- 5.3 Finally, we discuss providing guidance on reasonable adjustments for training grants, to provide clarity on how UKRI will discharge its legal duties to provide for reasonable adjustments under the Equality Act and equivalent legislation in Northern Ireland.
- 5.4 In reviewing our own provision, we have also taken account of differences between the scheme that we offer, and other DSA schemes, notably the statutory scheme for English undergraduates run on behalf of the Department for Education by the SLC.

Changes to the TGCs in respect of DSA Framework and reasonable adjustments

- 5.5 We are introducing **TGC 3.4.3** on the duty to make reasonable adjustments in response to three recommendations from Advance HE:
- UKRI to ensure that grant holders are aware of the need to ensure that reasonable adjustments cover the breadth of a doctoral student's research for example, to the research environment, within their department, during field work and while on work placement. Advance HE said the latter is likely to involve liaison with the work placement provider.
 - UKRI to provide further information within the TGCs on the need for anticipatory reasonable adjustments as well as the provision of DSAs.
 - UKRI to ensure that grant holders make reasonable adjustments as soon as they are made aware of a person's disability or could reasonably be expected to know that a person is disabled. This could be during the application process as well as on commencement of a stipend and during a stipend.
- 5.6 In addition, the EDI Caucus highlighted that some students find that adjustments accepted as reasonable by the provider are not implemented. As an example, they noted:

'One disabled respondent reflected on how if they had known how difficult securing adjustments would be via either the funder or their institution, they would not have applied for doctoral training in the first

place.’
(Richards, et al., 2024, p. 25)

- 5.7 In order to ensure we have addressed the issues outlined above, in Chapter 2 we set out that we will require that ROs ensure providers have a policy that enables them to put in place reasonable adjustments. **TGC 3.4.3** further reminds providers that the legal duty to provide reasonable adjustments for students lies in legislation and on the provider. It may therefore be reasonable for a provider to put in place an adjustment even if it is not covered by an agreement with UKRI.
- 5.8 To ensure that adjustments are put in place as quickly as possible, **TGC 3.4.4** now places a requirement that providers inform persons who may become UKRI funded students that if they are disabled they can request reasonable adjustments at the earliest opportunity, for example, in any prospectus material and in communications offering a person a studentship. To support this, we will also allow DSA costs to be eligible from the point at which the studentship is offered, as described below.
- 5.9 New **TGC 3.4.5** will specify that reasonable adjustments should be made in a timely fashion and students must be provided with a process to highlight any adjustments that are not fully implemented. Failure to make reasonable adjustments in a timely fashion may, in some instances where the student cannot continue studying for a period, mean a student requires ‘Additional Leave: Additional disability leave associated with delayed adjustments’ (see Chapter 3). While this is an allowable cost from the grant, where a provider is in breach of **TGC 3.4.3** it could result in UKRI removing some or all of our funding from the provider.
- 5.10 We recognise that the support we provide can influence a provider’s ability to provide adjustments to disabled students with UKRI funding. We are therefore proposing changes to our DSA Framework to help support students.

UKRI DSA Framework

- 5.11 Unlike undergraduate DSA schemes where the student applies directly for support, under the UKRI DSA Framework the student applies to the provider or RO which can then recoup costs provided that their practices align to those set out in the framework.

Shift emphasis from medical diagnosis to the needs assessment
- 5.12 Under the current UKRI DSA Framework, where a student’s disability has not been documented previously, a diagnosis of the disability by a suitably qualified person or body for the purposes of establishing eligibility for DSA has been required. A written statement from a qualified professional confirming that a student has a disability should be sufficient evidence.
- 5.13 As the EDI Caucus found, this can cause delays as a diagnosis can be challenging to secure. This is the case where there are long NHS waiting lists, or for certain medical conditions (such as myalgic encephalomyelitis or chronic fatigue syndrome) where a formal diagnosis could take months or years to achieve by process of elimination or where no clear diagnosis may be possible. In our engagement, we also heard that a medical diagnosis is not necessarily helpful for the DSA needs assessment, other than for certain learning conditions where, for example, a medical assessment of the level of dyslexia can be helpful.
- 5.14 In April 2025 we will update the UKRI DSA Framework to better align with EHRC’s ‘Technical guidance on further and higher education’ (EHRC, 2014) which states that “there is no need for a person to establish a medically diagnosed cause for their impairment. What it is important to consider is the effect of the impairment not the cause.”

As with our approach to providers' policies on reasonable adjustments, our approach for the DSA framework aims to be in keeping with the judgement in *Bristol v Abrahart*:

'the lesson ... is not that due process and evidence are unimportant where the question of reasonable adjustments [for disabled students] arises in this context. They are important. There will no doubt be many cases where it is reasonable to verify what the disabled person says and/or to require expert evidence or recommendations so as to make well informed decisions. A degree of procedural formality will also generally be appropriate for the reasons which the University advanced. But what a disabled person says and/or does is evidence. There may be circumstances, such as urgency and/or the severity of their condition, in which a court will be prepared to conclude that it is sufficient evidence for an educational institution to be required to take action.'

(University of Bristol v Dr Robert Abrahart, 2024)

5.15 In the updated UKRI DSA Framework, providers will still need to ensure they are satisfied that a student has a physical or mental impairment that has or is likely to last more than 12 months¹⁰, and that puts them at a substantial disadvantage. ROs will need to be satisfied that partner providers have a process in place. The student may have a final medical diagnosis, but where the RO is satisfied that the student requires a needs assessment they may have this without a diagnosis. As set out in the judgement above, there will be cases where it is reasonable to verify what a disabled person says, but that what a person says or does is evidence and, in some cases, may be sufficient. This will not leave us without checks – effectively we will be shifting the emphasis to the needs assessment, where appropriate support and adjustments would be discussed, checked and then implemented.

5.16 Engagement with our OP highlighted that there is still a range of practices in the sector, with some expressing reservations, for example a fear that it might clash with provider practice and be disruptive. Others, however, were very supportive, for example:

'I strongly agree with not gating support based on diagnosis. This is standard practice with our Disability Advisory Service, is consistent with the law, and avoids the outdated medicalised model of disability.' [OP member]

5.17 One OP member suggested it would be helpful to have further guidance on what evidence is acceptable for DSA. Another noted that steps would need to be taken so as not to burden students with disproportionate alternative evidence requirements. We will consider whether we can provide further guidance in April 2025. However, any advice is likely to be significantly based on or refer to existing EHRC guidance. Our overall view is that that providers are responsible themselves for determining what evidence they require from their students for proof of a disability.

Change rules so the DSA needs assessment and support is claimable from point of studentship offer, allowing DSA support to be put in place for the start of the studentship

5.18 Students are reportedly waiting a long time after starting their studentship to have reasonable adjustments put in place. We will now allow a needs assessment before the studentship has started with adjustments put in place for the start of the period, enabling students to focus on studying. This better aligns to the undergraduate DSA scheme run by the Student Loans Company (SLC), where undergraduates apply for DSA while applying for their student finance.

¹⁰ This is the general guidance, there are exceptions that we will set out in the framework. For example, under the Equality Act 2010 cancer is to be treated as a disability from the point of diagnosis and the 12-month rule does not apply.

- 5.19 With this change there is a risk that the UKRI DSA support will be in place for a student who does not go ahead with the studentship. SLC has identified a similar risk and has dedicated resource to recover items and recoup costs for student who do not start their course. We do not have this resource, and the onus is on the provider to recover equipment from a student who does not start. However, we recognise that the cost of that equipment may not be recoverable, for example, costs might not be recovered from a laptop with specialist and individualised software installed. The amended DSA Framework will state:
- Where a student does not start, and wherever reasonable, providers should return any unused equipment to the supplier and not claim the cost from UKRI.
 - If equipment is provided to a student *after* they have informed the provider or RO that they will not take up their studentship, these costs are not eligible for recovery under UKRI's DSA Framework.
 - If equipment is provided to a student, and the student subsequently informs the RO or provider that they will not take up their studentship, these costs are only recoverable from UKRI if (a) the RO or provider recovers the equipment from the student and (b) the RO or provider cannot get a refund from the supplier.
- 5.20 The aim of these measures is to incentivise ROs and providers to take steps that ensure the UKRI DSA Framework is only used as intended.
- 5.21 Currently, UKRI DSA is claimed by the project lead annually. This change may mean that some DSA costs are brought forward by one academic year, though some students are likely to continue having their needs assessments after their programme has started. UKRI's costs for DSA vary from year to year, as set out in Chapter 7.
- 5.22 UKRI is also committed to replacing the Je-S Studentship Details Functionality. This may have an impact on how UKRI DSA is claimed by ROs in the future.
- Allow costs for specially adapted furniture that is required for study purposes in the student's office, library, laboratory or other facilities at the provider*
- 5.23 UKRI allows costs for specially adapted furniture that is required for study purposes in the students' own residence but not furniture for the office, library, laboratory or other facilities at the provider. Disabled Students UK's report 'Improving the experience of disabled PhD students in STEM' flagged that this differed from the scheme run for undergraduates by SLC (Disabled Students UK and Pete Quinn Consulting, 2023). In April 2025, we will amend our scheme rules to allow these costs to be eligible for claims under the UKRI DSA Framework
- Allow costs to continue to be drawn from the grant after the end of the funded period*
- 5.24 UKRI's Statement of Expectations for Doctoral Training (UKRI, 2024) sets out that we expect providers to support students to submit their thesis or equivalent within their funded period. However, many providers allow a grace period after the funded studentship has ended. We estimate that 80% of students make use of this period. Students recorded as disabled on Je-S appear to be 1.3 times as likely to submit their thesis or equivalent over a year after the end of their studentship.
- 5.25 We will allow continuing provision of a DSA as an allowable cost, provided the adjustment was in place before the end of studentship. The arrangement may last up to either (i) 18 months after the end of the studentship or (ii) until the student has had their viva and submitted any corrections; whichever the earlier.



Using DSA to fund studentship extensions due to disability

5.26 One of Disabled Students UK's recommendations was that:

'Funders should allow funding extensions on disability grounds, creating an accessible application process for this purpose.' (Disabled Students UK and Pete Quinn Consulting, 2023)

5.27 We are actively exploring whether we can accept this recommendation. Such a change could expand the allowable costs within the UKRI DSA Framework to fund an extension to the studentship:

- when a student is working at a slower pace due to disability, or
- where the student has predictable medically required or advised appointments that need time away from study beyond that (or likely to be beyond that) allowed in the TGCs for absence.

5.28 However, while the OP broadly felt that such a change might be positive, they highlighted some complex issues that require further consideration. For example:

'Many, (but not all) aspects of [a disability] can be accommodated through standard support measures and mitigate the need for extensions. The key issue is to appropriately assess and fund a slower pace of study.'

'Dependent on the nature of the research and the disability, students may find different parts of the PhD challenging. Clarity on whether DSA funded support would be available for the extended period would be welcome.'

5.29 We also recognise that additional time in education comes with a cost to students, for example, in terms of lost lifetime earnings. We therefore agree that, if we introduced the change, it should only be used where other reasonable adjustments cannot mitigate the impact of the health condition.

5.30 If we introduce a change, our current assumption is that it would support a small portion of disabled students. Work commissioned by the Department for Education in January 2019 indicates that 1% to 4% of students in higher education had been provided with extra time to complete tasks (Johnson, Rossiter, Cartmell, Domingos, & Svanaes, 2019). We also currently assume it would mitigate only the disability, not other factors that might lead a student to submit after the end of their UKRI studentship.

5.31 Taking all of these views into consideration, we will work with the sector in the first half of 2025 to consider whether we can scope and provide sufficient guidance for using additional time as a reasonable adjustment. We will confirm whether we can introduce the change for the 2025-26 academic year in April 2025.

UKRI Reasonable Adjustments for in the Training Grant Guidance

5.32 While the TGCs aim to provide providers with flexibility to make their own decisions about how to support students and the UKRI DSA Framework seeks to support ROs in allowing them to recoup costs associated with reasonable adjustments, UKRI also must meet its own duty in relation to equality legislation. We think it would help the sector for UKRI to set



out its own approach to reasonable adjustments for its training grants more clearly, taking account of specific provisions in legislation for education¹¹.

- 5.33 Earlier in this paper we proposed introducing **TGC 3.4.4** that states where and RO considers a conflict or tension arises between the reasonable adjustment it provides for a disabled person, and a UKRI provision, criterion or practice (including, but not limited to, the TGCs), the RO's statutory obligation to provide the reasonable adjustment takes precedence but the RO must notify us of any and all such instances. This will enable us to then consider any adjustments we may need to make to our TGCs or other practices.
- 5.34 We will publish the new guidance on how we will do this as part of the Training Grant Guidance in April 2025. It will:
- Set out in clear terms how UKRI would meet legal obligations in relation to disability, outline the relevant equality legislation within the UK and the definitions and expectations around reasonable adjustments in the different jurisdictions of the UK.
 - Provide clarity around responsibilities of UKRI, ROs and providers. The guidance will make clear what the responsibilities of ROs are in relation to where any place of study provision, criteria or practice; physical feature or but for the provision of an auxiliary aid creates substantial disadvantage for a student – and the requirement to make reasonable adjustments as a result. The guidance will also outline our responsibilities where UKRI's practice, criteria or provision creates a substantial disadvantage for students. This may be through TGCs or other structural aspects of UKRI's offer in relation to PGR funding.
 - Set out the process by which we expect to manage and consider potential conflicts in our rules (as per **TGC 3.4.4**) or requests for reasonable adjustments. This will be informed by EHRC's guidance on how to consider these areas.
 - Consider developing accompanying guidance with relevant subject matter experts and disability organisations in the future.
- 5.35 Our intention therefore is that the provider, which has responsibility for making adjustments for the students it takes on, would make a determination as to whether an adjustment is reasonable. If this conflicts with our requirements we would then consider whether we need to provide a further adjustment ourselves.

¹¹ For information on UKRI's wider approach to reasonable adjustments, see the [UKRI webpage: Disability and accessibility support for UKRI applicants and grant holders](#).

Chapter 6: Collective Talent Funding and miscellaneous provisions

- 6.1 In this chapter we set out some further miscellaneous changes to the TGCs and responses to a small number of other Advance HE recommendations. In addition, the changes include reforms of rules on allocation of costs to better reflect the ambition of Collective Talent Funding (CTF), more specificity on how stipend increases are handled, a new requirement on compliance overseas and removing the Covid-19 annex. Recommendations on combining TGCs on the right to join a union and on how information is presented are also discussed. Finally, we note some future changes associated with the transition from UKRI's Joint Electronic Submission (Je-S) system to the Funding Service.

CTF, fees and allocation of costs

- 6.2 In the 'UKRI Strategy 2022 to 2027: Transforming Tomorrow Together' (UKRI, 2022) we introduced UKRI's transition to CTF. Our intention is to join up all our talent investments so that they are:
- simpler to understand and for awardees to administer
 - consistent, while still meeting the needs of individuals and disciplines
 - better able to bridge disciplinary and sector boundaries.

Allocation of costs to a single council or grant

- 6.3 Under **TGC 4** are a number of conditions on how a UKRI training grant may be used, including allocation of costs. We are amending some of these to better align with the above ambitions and with new practices. In particular, **TGC 4.5** contains several details on the remit of doctoral training under a grant, attribution to a single grant, and funding conditions, which we will split into separate conditions. The existing condition currently states that:

'TGC 4.5 Where a Student is eligible for a full award, at least 50% of the total cost of the Studentship must be drawn from the Training Grant or Training Account of a single Council. A Student must not be expected to bear the cost of any shortfall in funding. Notwithstanding any Specific Conditions, the research undertaken by a Student as part of a Studentship must fall predominantly within the remit of the Council(s) funding that Studentship. One Council must always be designated as the majority funder for monitoring and information purposes.' [UKRI TGCs]

- 6.4 Under CTF, investments may be issued through joint or cross-UKRI funding opportunities as well as those from a single council. It is no longer correct to imply that all of a studentship is funded from a single council. Where previously it had been a condition of **TGC 4.5** that 50% of the total cost of the studentship be drawn from a training grant or a training account of a single council, **TGC 4.5** will now simply state "At least 50% of the total cost of the Studentship must be drawn from UKRI".
- 6.5 New **TGC 4.5.1** will provide a further condition on how this funding is managed. It will state "The UKRI contribution to studentship costs must be drawn from a single Training Grant at any one time". Reflecting differences in how councils award some grants, it will go on to state that "We expect the total costs for the full duration of the Studentship to be drawn from a single Training Grant unless the award letter provides explicit allowance for funding to be drawn across consecutive grants". This means that, where a council has allowed project leads to manage funding across consecutive grants, this can continue.



- 6.6 The existing **TGC 4.5** goes on to state that “Notwithstanding any Specific Conditions, the research undertaken by a Student as part of a Studentship must fall predominantly within the remit of the Council(s) funding that Studentship.” As with the change in paragraph 6.4 (above), several councils already support studentships in the remit of other councils as part of a wider training programme and more cross-UKRI funding opportunities should be expected in future. To ensure we reflect the intentions of the investment and not management decisions (for example, one council leading a funding exercise on behalf of all), the existing language will be replaced by a new **TGC 4.5.2**: “The research undertaken by a Student as part of a Studentship must fall predominantly within the remit described by the *funding opportunity* for which the award was issued” (emphasis added).

Full and fees-only awards

- 6.7 **TGC 4.5** includes a reference to a “full award”. Historically it was possible for a student to have either a “full award” (including funding for the fee and stipend) or a “fees-only” award (which had no stipend). Fees-only awards were used for certain non-UK students. We stopped allowing new fees-only studentships as part of reforms in 2021-22 on international eligibility for UKRI studentships. We are now amending **TGC 4.5** to remove the phrase “Where a Student is eligible for a full award” reflecting that we no longer offer fees-only awards. For the same reasons we are deleting **TGC 4.4**.

Fees (including international fees)

- 6.8 Several requirements on fees are currently contained within **TGC 4.7**. We are separating it into separate conditions so that the types of costs that may be included in the fee level is separated from the costs students may bear.
- 6.9 **TGC 4.7** currently states that “Home Students must not be charged additional fees, above the level paid by Us. For International students, You are able to claim the difference between home and International fees from other sources, but these costs may not be taken from the Training Grant or other UKRI funding.” In addition, **TGC 4.5** has also placed a condition on fees, as the existing condition states that a “Student must not be expected to bear the cost of any shortfall in funding.”
- 6.10 Instead, new **TGC 4.7.1** incorporates the aspect of **TGC 4.5** on students bearing costs, and the part of the **TGC 4.7** that had said “Home Students must not be charged additional fees, above the level paid by Us” replacing and combining these to state that “With the exception of **TGC 4.3**, Students must not be expected to bear the cost of any shortfall in funding nor charged costs above the level paid by Us (including additional fees) during their funded period”.
- 6.11 **TGC 4.3** previously stated that “Training Grant Funds cannot be used to cover the difference between home and overseas fee rates.” Later, **TGC 4.7** stated that international fees could be charged from other sources but not the training grant. We have amended **TGC 4.3** to cover these points in a single condition. We have also made explicit that the difference between a home fee and an international fee can be recovered from an international student, though we note and welcome that many providers choose not to do this. Note that providers may need to pay due regard to consumer law if making any changes to fees for students.

Stipend

- 6.12 SQW’s recent review of the effect of UKRI stipend levels on UKRI studentships found that, of the 79 ROs that responded to the question, 90% reported that they normally change or uprate stipends at the start of the academic year, 9% on the anniversary of the student’s start date and 1% responded “don’t know” (SQW, 2025). Uprating a stipend on the



anniversary of the start date means, for example, a student who started their studentship in January 2025 would not their stipend increase in January 2026 instead of October 2025.

- 6.13 With undergraduates, the Student Loans Company has different academic years for students starting throughout the year. However, it diverges from the norm for PGR and from UKRI's historic assumptions. Some ROs may have applied this to UKRI funded students, meaning that increases to the stipend since 2022 did not immediately support some students as we had intended.
- 6.14 We will therefore amend **TGC 2.10** to state that: "When UKRI changes the minimum stipend, changes must apply no later than the first stipend payment after 1 October. You may implement the new minimum stipend before 1 October."
- 6.15 In our engagement with the sector we were asked about students who start shortly before 1 October, for example, where the RO's academic or financial year begins on 1 August and the student is part of a second cohort, or a grant that otherwise started before 1 October. We can confirm that the rules as described above will allow the provider, with the RO's permission, to start a student on the stipend that will apply for the rest of the academic year. We will set this out in the guidance when this is updated in April 2025.
- 6.16 We have also introduced a new definition for "Academic Year". For the purposes of the TGCs, the Academic Year will be defined as 1 October to 30 September of the following year. This reflects that most training grants start on or around 1 October.
- 6.17 The SQW review also found a wide variety of practices in applying stipends. 72% of ROs who replied to the survey pay them monthly, 27% quarterly and 1% twice a year. Some, mostly smaller, ROs pay stipends in arrears rather than in advance. We are not currently proposing rules on how stipends are paid but will consider whether we can issue further guidance on stipends in April 2025 or at a later date.

Compliance overseas

- 6.18 From time to time UKRI receives requests about students working overseas. **TGC 5.2.4** notes that it is the RO's and provider's responsibility to ensure that they meet local legal requirements on them.

Covid-19 conditions

- 6.19 Appendix A of the Training Grant Conditions relates to specific conditions introduced during the Covid-19 pandemic. While the OP noted that some students have still been making use of the conditions, we intend to remove the appendix.
- 6.20 We note that students who started their studies at 50% FTE in academic year 2020-21 could still be studying in 2027-28. Those who have had a break from studies of 28 weeks or maternity leave may not completed until 2030. Nonetheless, we feel we can now remove the appendix as:
- The allowance for sick leave of up to 28 weeks in respect of Covid-19 will effectively be superseded by new **TGC 8.2**, which will allow 28 weeks leave for medical leave in all circumstances. Where students have already accrued Covid-19 related sick leave before AY 2024-25, they will still be eligible for an extension on that basis. We will make this clear in guidance in April 2025.
 - The allowance for more than one change in mode of study for Covid-19 will be superseded by new **TGC 7.1.1**, which allows more than one change of mode of study for any student where this is with the RO's consent.

- Costs for short term events and activities. Recognising the exceptional circumstances of the pandemic, during which nations legally restricted the ability to gather meaning events were postponed, we had allowed the cost of attending postponed events to be drawn from the training grant even if occurred beyond the student's funded period. As the final Covid-19 lockdown was in 2021, all postponed events must now have taken place. This provision will be removed.
- Extensions. The Appendix states that: "Where an extension is applied to a student's funded period due to disruption caused by the Covid-19 pandemic, this may be done so in addition to any extensions covered by **TGC 6.1.1**, even if this would exceed the maximum extension allowed as detailed in section **TGC 6.1.1**." Whereas previously the maximum extension was not normally more than one year, in the revised TGCs we state that an extension should not be more than a year other than in circumstances stated in the amended **TGC 6.1.1**. These circumstances will therefore include "an extension related to Covid-19 (including sick leave, shielding leave where a shielding letter had been obtained, or a period of disruption) where this was agreed in writing by the RO before 1 October 2025."

6.21 Note that the new **TGC 6.1.1** imposes a deadline on granting extensions of 1 October 2025. ROs will therefore need to act to ensure that any UKRI student that requires an extension for this receives a written confirmation in the before this deadline, even if the extension itself will not be take place until sometime after this date.

Right to join a union

- 6.22 When we commissioned Advance HE to review the differences in support between PGR students and members of staff, one area it noted was that staff have a legal right to union representation. It suggested that UKRI could consider including within the TGCs the right of people on studentships to join a trade union and participate in trade union and National Union of Student activities. We have considered this recommendation carefully. We have not seen evidence that students are being discriminated against because of roles in student or trade unions. We therefore do not find a reason to include this within our TGCs at this moment.
- 6.23 Notwithstanding that we are not amending the TGCs, we recognise the importance of student voices, as expressed through their submissions to the New Deal for Postgraduate Research, work we have commissioned to hear directly from students, and our direct engagement with student representatives including with University College Union.

Format of the UKRI Standard Terms and Conditions of Training Grant

- 6.24 Advance HE recommended that we consider combining the TGCs and the Training Grant Guidance into a single document. We note that there are a range of policies, guidance and other information available from UKRI for grant holders, much of which is available on the UKRI Good Research Resource Hub¹². There is further a series of non-UKRI requirements on quality of studentships, some of which are described in Chapter 2. We are therefore minded not to combine the two documents highlighted by Advance HE. Most of the OP members agreed with this, though others noted that it would be helpful to have a single source of guidance, where possible. We will take the following further steps:
- We will publish revised Training Grant Guidance in April 2025. Our longer-term aim is that the Training Grant Guidance becomes the main reference point for project leads, co-leads and grant managers working on training grants, setting out our requirements in

¹²See: [Good research resource hub – UKRI](#)



more detail. The TGCs would become a reference point for anyone seeking clarity on what the strict requirements are.

- We will communicate more directly with students, supervisors, disability offices and others about what support we offer to UKRI students, from the start of the 2025-26 academic year. The aim of this exercise will be to increase awareness of the support on offer, not to replace ROs' or providers' own communications. Our communications will specifically direct students to seek further information from their ROs or providers.
- 6.25 Advance HE further recommended that UKRI provide clarity on the minimum length of studentship within its terms and conditions. In January 2024 UKRI published a Statement of Expectations for Doctoral Training. This sets out that UKRI will model the funding that UKRI provides per student based on at least 3.5-years duration FTE whilst enabling flexibility for the RO to set the funding period based on the circumstances of the individual student. **TGC 2.9** was amended on 1 April 2024 to include a reference to the new Statement of Expectations for Doctoral Training. The requirement now states that, alongside QAA guidance, ROs are expected to select, administer and supervise students in line with either the 2016 Statement of Expectations for Postgraduate Training, or the 2024 Statement of Expectations for Doctoral Training.
- 6.26 Two other Advance HE recommendations suggested that UKRI review the information and advice available to students, first in relation to the childcare support available to them and second where they are carers. Advance HE noted that, in its view, student carers studying 50% of the FTE are likely to be eligible for Carers Allowance.
- 6.27 The EDI Caucus' research underlined that some students become pregnant or parents without full knowledge of the maternity, paternity or parental leave available to them. It is also likely that they do so without full knowledge of their eligibility for childcare. Childcare provision is devolved and so varies in England, Scotland, Northern Ireland and Wales. Some ROs may also provide on-site nursery provision. UKRI is not well placed to provide advice to students on the childcare or carer support available to them therefore we are not introducing this recommendation into the TGCs. We do however welcome feedback on how the sector might best cater for student needs in this regard.

Language

- 6.28 In November 2022 we had amended **TGC 11.4** to state that “publication can be accepted in English or Welsh”, with the intention of making clear that Welsh is acceptable as well as English. This provision is being removed to reflect that there are no language restrictions on publications, and other languages may also be acceptable.

Transition to the new Funding Service

- 6.29 Researchers and others who apply for or manage our funding do so through an online system. All research councils are now transitioning from the Joint Electronic Submission (Je-S) system to the [UKRI Funding Service](#). This means that all applicants, grant holders, research support staff, reviewers and panel members must start using the new Funding Service. The Funding Service uses [role descriptors](#) that differ from the previous Je-S system.
- 6.30 As part of the transition, UKRI will be updating the role descriptors in both the TGCs and the UKRI research grants (sometimes called FEC grants). This work is not incorporated into the 'Annotated revisions of UKRI Standard Terms and Conditions of Training Grant' (January 2025) published alongside this policy statement. We intend to revise the language by April 2025.



- 6.31 One of the ways in which we use Je-S is to manage data on studentships. Ahead of the final decommission of Je-S, we will be changing how studentship data is submitted to us. Our intention is that the new system will be in place ahead of 1 October 2025. Further details will be communicated to project leads and others who work on training grants in due course.

Chapter 7: Cost benefit analysis

- 7.1 In this chapter we discuss the potential costs of the proposed measures and the benefits they may yield. We hope publishing this will also be helpful to ROs and other funders who are considering whether they should adopt some of UKRI's changes. We consider:
- Whether the changes are in the spirit of the 2022 'Review of Research Bureaucracy'.
 - The cost of new requirements in respect of legal or regulatory compliance.
 - The direct cost of providing additional leave and DSAs and indirect cost, including where the reforms reduce levels of early termination. Reducing early termination is a good outcome, but in our assessment may incur a "cost" by reducing the underspend generated on some grants.
 - The benefits to students. In many cases the individual students who receive additional support because of these measures will benefit directly, though here we are primarily focusing on the potential improvement to performance of UKRI's investments, through reductions in early termination, better rates of completion within the funded period and other measures.
 - Whether the changes described in this paper discourage ROs from maintaining or developing funding from other sources.
- 7.2 Consideration of costs are partly within the context of **TGC 1**, which states that UKRI reserves the right to amend and vary the TGCs or any applicable policies. It notes that additional costs incurred as a direct result of changes should be managed within the training grant cash limit, but where the cash limit is exceeded solely due to costs incurred as a direct result of changes made to the TGCs, a case can be made to us for additional funds on an exceptional basis. The assessment of costs should therefore be beneficial to ROs and their staff working on training grants. Our assessment of changes as they stand is that they will be well within current expected expenditure on UKRI's training grants overall, but there will be instances of individual grants that need changes or extending to support additional leave. This is discussed below.

Principles of research bureaucracy

- 7.3 In 2022, Professor Adam Tickell provided his final independent report to the government on research bureaucracy (Tickell, 2022). The report developed seven principles for reducing research bureaucracy:
- Harmonisation
 - Simplification
 - Proportionality
 - Flexibility
 - Transparency
 - Fairness
 - Sustainability
- 7.4 Below we present Tickell's definition of each of the principles in the review, with a brief description of how we have considered these principles in making the changes.
- 7.5 **Harmonisation: Reducing the volume of administration through the use of common processes between different funders to make essential work easier.** As set out in Chapter 2, when considering Advance HE's recommendations and other evidence, we

have sought to better align with existing standards rather than to introduce new ones. In a number of places it is, in our view, proportionate to supplement these requirements, as set in the next section.

- 7.6 Overall we are committed to having a single set of TGCs for all of UKRI's training grants and, through CTF, are committed to further harmonisation across our talent portfolio. We will ensure the TGCs are consistent with UKRI's standard terms and conditions for research (or FEC) grants, noting that in some places divergence is necessary to reflect the different positions of students and staff. For harmonised conditions, updates will be made to the standard term and conditions of FEC grants in April 2025.
- 7.7 **Simplification: Reducing the complexity of individual processes to address unnecessary bureaucracy.** On the whole, the TGCs do not directly dictate processes. We have sought to simplify where the option exists, for example in revising **TGC 2.2** on legal expectations. The proposed changes to **TGC 6.1** and **TGC 8**, where we have more clearly set out where and when we expect to be consulted by an RO before providing an extension, should simplify the process.
- 7.8 **Proportionality: Ensuring that the obligations placed on researchers and institutions are commensurate with the size of the risk or reward.** In Chapter 2 we set out a number of obligations on ROs. The vast majority of these are obligations that already exist, but whereas in the past they were implicit within the general requirement for ROs to comply with all legal, regulatory and ethical standards, the requirements on consumer law, employment law, student regulation and some further requirements in respect of equality law will be stated explicitly.
- 7.9 In a number of instances we propose to require an RO to hold a policy. We have not dictated what the content of the policy should be. In our view this is a proportionate intervention which balances the need for ROs to actively address issues raised by our call for input, Advance HE, EDI Caucus and other sources, while respecting that different ROs will have approaches that better reflect their own practices and resources.
- 7.10 We are particularly mindful that, while the majority of UKRI funded students are on training grants led by larger, more research-intensive organisations, some are led (and many have partners with) ROs that have smaller numbers of students. In adopting the approach set out above, our intention is to balance the importance of the issues for students, with the fact that a small number of ROs will come across the issues rarely, if at all.
- 7.11 **Flexibility: Supporting and embracing excellence wherever it is found and not excluding research that does not fit within narrowly defined parameters.** As set out in the policy statement, flexibility was one of the three principles at the core of this review. We are actively seeking to provide ROs with the flexibility to support UKRI funded students, through improving provision of leave, DSAs and other measures.
- 7.12 **Transparency: Communicating the rationale for systems and processes which have a bureaucratic burden.** In this document we have set out the rationale for the proposed changes. In doing so, we hope to provide the community with an additional reference point for those who need greater clarity.
- 7.13 **Fairness: Developing approaches to systems and processes that support fairness, rather than erode it.** For students who are consumers, ROs have specific legal obligations under consumer law regarding fairness. We have sought to underline this in our changes, as outlined in Chapter 2.
- 7.14 **Sustainability: Cutting bureaucracy in ways that avoid destabilising the system to deliver a more efficient system over the long term.** In a number of places we have proposed reducing bureaucracy, including on changes to where extensions may be

provided and in relation to the medical evidence required to obtain a needs assessment under the DSA Framework. Where we have introduced new requirements these ultimately seek to provide greater clarity around the process for students and staff members.

- 7.15 In their responses, some of our OP noted that further guidance from UKRI could assist simplification. While we are sympathetic to the arguments that staff within ROs could benefit from clearer guidance on compliance with legal standards, it has never been the case that UKRI as funder was able to provide this. In the same way as ROs are responsible for ensuring their own staff have an appropriate working knowledge of regulations on data protection, health and safety or managing staff, we think most staff who deliver training to students will already have, or over time will develop, a basic knowledge of non-UKRI policies, practices and procedures that exist to support students.

Cost of new requirements in respect of legal or regulatory compliance

- 7.16 In Chapter 2 we discuss amending the TGCs to better reflect external regulatory requirements that seek to protect students. UKRI's focus on these requirements may lead to ROs reviewing their compliance with those standards. As a result some ROs may also need to instigate changes to better align their policies or practices with those regulations. Any RO work on compliance with existing regulatory requirements cannot be ascribed to UKRI's TGCs. Such costs instead relate to the introduction of the regulation in the first place.
- 7.17 We have also made a number of new changes that may incur costs for ROs (beyond the direct costs of providing extensions which are discussed in the subsequent section). These changes are set out below, alongside our initial assessment of their costs to the RO.

TGC 2.12 The Research Organisation must have a policy to support the efficient and satisfactory identification and resolution of complaints from students. Students funded by Us must also have access to an appropriate ombudsman scheme, and the Research Organisation(s) must pay due regard to any guidance from the relevant ombudsman. Where You are delivering training in partnership with other research organisations, You must ensure any partnership agreement is clear on handling and liability for such complaints. You must ensure that all Students funded by Us and Supervisors are aware of mechanisms to provide feedback and resolve complaints.

- 7.18 Most ROs that are also HEPs are required to be part of an ombudsman scheme in legislation. They are also likely to already have a complaints policy for students, as ombudsmen tend to refuse to accept complaints unless they have been through the institution's complaints process first. If an RO is not a "qualifying institution" under section 11 of the Higher Education Act 2004 it is possible that, in England or Wales, they could seek to apply to become a member of the OIA under OIA's rule 3.3 (OIA, 2018).
- 7.19 Further, the OfS specifies that English HEPs must already comply with OfS Condition C2 on student complaints schemes. This states that English HEPs must:
- Cooperate with the requirements of the student complaints scheme run by OIA, including the subscription requirements.
 - Make *students* aware of their ability to use the scheme.
- 7.20 Our requirements go further than the existing regulations in two respects. First, that due regard is paid to ombudsman guidance. In this document and in our guidance in April 2025, we will make specific reference to the OIA Good Practice Framework where relevant. On the whole we assume that most ROs will consider relevant guidance including the framework from time to time as part of the normal development of their own complaints processes.

- 7.21 Second, we require awareness not only of students' ability to use the scheme, but more general *mechanisms to provide feedback* (itself broadly consistent with the OIA Good Practice Principles in England and Wales¹³). Moreover, in addition to students, we require that all *supervisors* of students funded by UKRI have awareness of these mechanisms.
- 7.22 We assume that, on average across the sector, measures to move towards a positive culture and increase awareness of the importance of feedback and complaints might take one hour of time per year across each member of the supervisory team. In 2021 UKCGE estimated that there were 22,135 principal research supervisors across the UK¹⁴. Assuming that around 20% of students are UKRI funded, up to around 4,250 staff members are likely to require some additional training to comply with this condition.
- 7.23 Benefits from the investment are likely to include a healthier research culture in which staff actively request and respond to feedback from students, and students report better outcomes in the ability to provide feedback. Earlier identification of issues that may lead to a reduction in negative mental health outcomes, early termination and late submission.

TGC 3.4.3 The RO must have a policy that enables it to put in place reasonable adjustments (including anticipatory reasonable adjustments) where required covering the breadth of a Student's research and training, for example, to the research environment, within their department, during field work and while on work placement. The policy should set out that students are only asked for evidence of a disability where it is necessary to do so. It may be reasonable for the RO to put in place an adjustment at the RO's expense even if it is not funded or authorised by Us.

- 7.24 While it is a legal requirement that the RO provide reasonable adjustments, the requirement for "a policy" to support this is a UKRI one. In practice, we anticipate that most ROs will already have a policy that enables them to provide reasonable adjustments. Evidence from The EDI Caucus (Richards, et al., 2024) and Disabled Students UK (Disabled Students UK and Pete Quinn Consulting, 2023) indicate that either some policies may not be fit for purpose or are not being delivered appropriately.
- 7.25 We are requiring that the policy set out that students are only asked for evidence of a disability where it is necessary to do so. As this requirement follows 2014 EHRC guidance (EHRC, 2014), recommendations of the OfS funded Disabled Students Commission (Disabled Students' Commission, 2023) and the *Bristol v Abrahart* judgement (University of Bristol v Dr Robert Abrahart, 2024), the cost of including that requirement cannot be directly ascribed to UKRI's proposed TGC change.
- 7.26 We assume that reviewing existing policies will be conducted at the RO level in the first instance, but that individual leads on training grants may then need to ensure that processes are in place with partners. Our assumption is that each RO may need around 38 staff hours to review their policy, and each grant holder on average a further 8 hours, noting that grants differ significantly in their size and the number of partners they may have.
- 7.27 We expect UKRI's requirement to have benefits including increasing the speed of resolving issues that may otherwise lead to negative outcomes for students, including poor mental health, early termination and late submission.

TGC 3.4.5 You must inform persons who may become UKRI funded students that if they are disabled they can request reasonable adjustments at the earliest opportunity, for

¹³ The OIA state that the principles should be taken as a whole, though note the language in our TGCs draws from the OIA principle that "There is an open and positive culture of **listening to feedback** and sharing learning that encourages students to have confidence that they will be treated fairly" (emphasis added).

¹⁴ [UK-Research-Supervision-Survey-2021-UK-Council-for-Graduate-Education.pdf \(ukcge.ac.uk\)](https://www.ukcge.ac.uk/UK-Research-Supervision-Survey-2021-UK-Council-for-Graduate-Education.pdf)

example, in any prospectus material and in communications offering a person a Studentship (such as an offer letter).

- 7.28 ROs will already have processes in place regarding offer letters. As we have highlighted elsewhere, where students are likely to be consumers these must meet the standards set down in consumer law, as set out in the CMA or (in England) OfS guidance as relevant. The cost of the requirement to also inform students that they can request reasonable adjustments if disabled should be negligible in most cases, as confirmed by our panel.
- 7.29 A desirable outcome of promoting reasonable adjustments is that more disabled students may take them up at an earlier stage. This could increase uptake of DSAs and, combined with changes to UKRI DSA Framework, may shift some of the workload associated with DSAs from October to late spring or the summer. Overall we expect this to be within the normal parameters of RO operations. The direct costs of these are to UKRI which funds the scheme and are discussed in the section below.
- 7.30 We anticipate two significant benefits with the requirement. First, in combination with changes to DSA Framework, improved compliance with the Equality Act in respect of provision of reasonable adjustments. Second, an improvement in outcomes in respect of disabled students, as discussed elsewhere.

TGC 3.4.6 You are required to ensure all staff and doctoral students receive suitable training, information and support to ensure compliance with Your obligations under all equality legislation. This should include (but not be limited to) information on what characteristics are protected and how the law defines these, harassment and victimisation, and specific protections regarding maternity in non-work cases. In England, Wales and Scotland, you should make students aware of the Equality Advisory Support Service (EASS).

- 7.31 The requirement to ensure all staff and UKRI funded students receive suitable training, information and support regarding equality existed in the current TGCs. The new requirement is that this should include specific information, including on what characteristics are protected, harassment and victimisation, and special protection on maternity; and the Equality Advisory and Support Service (EASS).
- 7.32 As discussed in Chapter 2, some of our OP felt that, while they provided training, their training did not cover all the elements we will now say they should cover. As the TGC states training “should” include the elements highlighted above, rather than saying the training “must” ROs have flexibility over when they introduce the specified elements and how, which will allow them to mitigate any immediate cost pressure.
- 7.33 Benefits are likely to include better staff compliance with equality legislation, reduced instances of direct and indirect discrimination, quicker resolution of complaints and a more supportive research culture, yielding better outcomes for research.

TGC 3.4.7 You must be able to demonstrate that you have considered the Public Sector Equality Duty in the Equality Act 2010.

- 7.34 The Equality Act 2010 requires that public bodies, including Higher Education Providers, pay due regard to the terms of the public sector equality duty. The TGCs go a step further and require ROs to be able to demonstrate this. To ensure compliance ROs may see fit to keep a written record of their considerations. The majority of ROs will already do this to some degree in their application for funding. However, it may be helpful to reflect on the terms of the duty. In instances where, through our compliance or other processes, we become aware of activity that appears to be inconsistent with the duty, we may ask an RO to demonstrate its compliance with it.

TGC 5.3 allowing lower than 50% FTE for a disabled person as a reasonable adjustment.

- 7.35 This change to UKRI's TGCs does not require that an RO offer less than 50% as a reasonable adjustment, however it does mean it is permissible for the RO to offer this with UKRI funding. The number of students who require an FTE of less than 50% for any period is likely to be negligible compared to the total training budget. However, it may extend some training grants, meaning final reconciliation falls into later financial years.

TGC 6.2.2 You should allow the student a companion at any grievance meeting, where appropriate, and ensure a record of communication and meeting is maintained.

- 7.36 We believe the cost of this change to be negligible and reflects existing OIA guidance in the OIA Good Practice Framework¹⁵. It may be beneficial in ensuring that grievance meetings are of a high standard and resolved effectively.

The TGCs previously required that "Payment of a Studentship must continue for absences covered by a medical certificate for up to thirteen weeks..." The new TGC 8.2 on Medical Leave omits the requirement for a medical certificate.

- 7.37 Some OP members felt that moving medical certification from our requirements might present a cost to ROs. We do not share this view. ROs are still able to choose to require medical certification where appropriate. Further, they may previously have been required to provide leave to a student because they were disabled, but not claim the costs of this from the grant under the previous conditions. Overall the change in our requirements should mitigate this risk and provide a net benefit to ROs. In some instances the removal of the requirement may also be to the financial benefit of students, who might otherwise be required to pay the cost of a medical certificate by their GP practice.

TGC 8.3.2.1 A policy should be in place to provide appropriate support for Students returning to study after a period of family, medical or additional leave.

- 7.38 We believe that many ROs and providers will already provide some level of support for students who are returning from a period of leave. The requirement for a policy should allow this support to be offered more consistently. While there may be an upfront cost in establishing a policy where one is not in place, we assume this will be a net-benefit to provider staff and students by having clarity on what steps to take. In these changes we have also specified that the fee can continue to be drawn from the grant while the student is on leave (provided it is consistent with the TGCs), meaning UKRI is providing funding at the usual level to facilitate students' continued access to certain facilities and the return to study provision.

Direct cost of proposed changes to absence policy and DSA

Absence costs

- 7.39 Chapter 3 sets out changes to UKRI's TGCs in respect of leave. Table 1 sets out the costs in financial terms and as a proportion of UKRI's total annual training grant spend.
- 7.40 The cost of has been based on these components:
- **Neonatal leave.** Applying Office for National Statistics data (ONS, 2024) to the UKRI funded student population and using statistics from Bliss (Bliss, 2024), we estimate that around 40 students a year might require an additional 12 weeks' leave.

¹⁵ The [OIA Good Practice Framework has a section on representation.](#)

- **Sick leave.** Official statistics from the Department of Work and Pensions (DWP, 2019) indicate that 1 in 25 employed people per year take a period of long-term sick leave (four weeks or more) and provides additional profiling data on the length of sick leave taken. While there are likely to be some differences between the PGR student and working population, applying these profiles to the student population¹⁶ as a benchmark we estimate that increasing paid sick leave from 13 to 28 weeks would cover full sick leave requirements for an additional 166 students and contribute to the sick leave for a further 99 students who would be likely to need to take more than 6 months sick leave in a year.
- **Leave related to disability and pregnancy-related illness** are reported in the same DWP report on long-term sick leave. We therefore have not provided a separate assessment of the costs of these components of medical leave.
- **Miscarriage.** Our assumption is based on rates of pregnancy and loss across the wider UK population. Assuming a similar rate of pregnancy across the UKRI student population as the wider population, we might expect to see around 1,500 live maternal births and 500 miscarriages a year¹⁷. We have presented the cost of this line separately, in line with our changes to explicitly allow this. We note however that, to some extent students may already have been taking miscarriage leave as sick leave under the current TGCs.
- **Carers leave.** Using UK census data on adult carers by age-group (ONS, 2023) and applying that to the number of PGRs within that age group based on HESA, we estimate that around 1,000 UKRI students may have some adult caring responsibilities.
- **Disability leave.** Our changes include explicit for extensions up to 4 weeks if the student is unable to study for over 5 days as the result of a delay in putting in place reasonable adjustments. In the absence of data available on the number of students unable to study due to agreed reasonable adjustments not having been put in place, the cost of this measure has been calculated by considering the disparity between disabled students and non-disabled students in failing to complete their studies (1.9%) and completing their studies over a year late (4.2%) and therefore assumes that 6.1% of disabled students might utilise disability leave. For calculation purposes, the number of disabled students per council has been taken from the HESA Student (Data Futures) 2022-23 academic year. HESA data indicates that 24% of UKRI funded students are disabled.

7.41 In considering additional costs, we assume that the stipend and fee will be drawn while the student is on leave, but that other costs will not change.

7.42 The costs outlined in this section are associated with providing additional leave that later results in an extension to the studentship. While a student is receiving the leave, the cost is the same as if they were studying, with additional spend only incurred at the end of their studentship, during the extension. This means the steady state costs outlined in Table 1 will be reached over a number of years. In the first year all UKRI students may take leave but the only costs will be for those who would have completed, but are now extended, in that year. Hence full costs are only expected to reach steady state from academic years 2028-29 or 2029-30 (depending on the length of studentship offered).

¹⁶ Some of our OP indicated that there might be some conditions requiring medical leave that are more prevalent among the PGR student population than the wider working population. We note, however, that other conditions are likely to be less prevalent. We do not currently have access to a better source of data on student medical conditions. For our purposes 1-in-25 is a reasonable assumption, but ROs looking to make an assessment for themselves may prefer to use their own student data, if available.

¹⁷ Estimates of miscarriage in the UK population vary significantly. (Tommy's, n.d.) indicates that 1 in 4 pregnancies result in miscarriage, the figure we have used here. For comparison, the NHS provides a lower estimate, that 1 in 8 pregnancies result in miscarriage.

- 7.43 In grants with multiple cohorts, the costs of extensions can often be managed within the grant and are only incurred by UKRI as a reduction in total underspend when the grant reaches its end. Grants that do not have multiple cohorts may also have sufficient underspend to manage extensions.
- 7.44 We further assume that the changes will help to reduce the level of early termination of studentships. When a studentship is terminated early, in some circumstances that can create an underspend on the grant that is returned to UKRI at the grant end. However, project leads with multiple cohorts of students might use an underspend to recruit a further student instead¹⁸. We have taken this into account by assuming that the rate of early termination shown in Je-S data for disabled students (13%) falls to the rate of students not recorded as disabled (9%). We further assume that (at UKRI level) around half of the underspend generated by early termination is returned to UKRI as underspend, while the other half is used for additional recruitment.

Table 1: Costs of changes to leave in steady state

Intervention	Annual cost (£ - 2022 prices) [1]	Annual cost as % of UKRI training grant spend [2]
Addition of neonatal leave (under Family Leave)	220,000	0.05
Changes to Medical Leave (including disability leave and pregnancy-related illness)	1,840,000	0.44
Addition of miscarriage leave (under Additional Leave)	440,000	0.11
Addition of carers leave (under Additional Leave)	550,000	0.13
Addition of disability leave (under Additional Leave)	760,000	0.18
Resulting reduction in termination	1,440,000	0.3
Total [3]	5,250,000	1.21

Notes:

[1] Rounded to nearest £10,000. UKRI financial year (which runs 1 April to 31 March) at steady state. Costs account for stipend and fee at current levels.

[2] Provided as a proportion of total spend (in Financial Year 2021-22) at steady state.

[3] Figures may not sum due to rounding.

- 7.45 All the figures provided are estimates and the actual cost could be higher or lower. Note that the estimates on leave assume that all eligible students would use their full amount of leave every year and some leave (such as in relation to miscarriage) may already be being taken as sick leave. This may indicate that, on balance, our figures overestimate the direct cost associated with leave.

Costs associated with reducing students terminating their studies early

- 7.46 In Table 1, we have included an estimate for the cost of reducing early termination. On average, around 9.1% of studentships ending between AY 2014-15 and 2022-23 terminated early. The rate for students who recorded as disabled on Je-S is 13.3%. Termination can be for a range of reasons, from a student entering the workforce in a

¹⁸ Note practices on grant awards vary amongst our councils. We recognise that this flexibility is more available to some forms of grant or disciplines than others.

related discipline (such as AI or engineering), ill health, or other reasons. UKRI does not currently hold robust quantitative data on the reasons students terminate.

- 7.47 One of the benefits of the proposed changes outlined in this policy statement is that the number of students who terminate their studies early will be reduced. This increase in the number of students qualifying is a welcome outcome. However, for the purposes of this chapter, we are also referring to this as a “cost” as early termination generally reduces spend, and hence a fall in early terminations may increase spend.
- We assume the changes would reduce the termination of disabled students to that of the general population of UKRI students, that is, from 13.3% to 9.1%, a reduction in termination of around 90 students a year.
 - We assume that for the most part where a student terminates their studies in their first year then the RO would use the funding to recruit another student (that is, starting later that year or the next year) and the impact on spend is negligible. We further assume that where a student terminates their studies in their final year, the majority of the spend associated with them will have been committed and again the impact on spend will be negligible. Based on our analysis of termination dates, this implies only around 50% of terminating students generate underspend¹⁹ on a grant.
 - Where student termination does generate underspend, it is only in proportion to the amount of their studentship they have left. For example, on an average 3.8 year studentship, a student terminating after 1.9 years would release 50% the cost of their studentship. We therefore estimate the average underspend generated by a termination is around 25% of the cost of a full studentship.
 - By enabling those 90 students to continue their studies, at a UKRI level we would therefore no longer generate around £1.4 million of underspend a year or 0.3% of UKRI’s total spend on training grants.

Management of costs

- 7.48 We are not proposing to increase the cash limit of training grants to account for the proposed changes. Our analysis of final expenditure on grants indicates that the majority will be able to absorb the costs set out above without any need for additional funding, albeit they may spend more within their cash limit.
- 7.49 Nevertheless, we recognise that some grants have more flexibility than others to support these changes. Existing mechanisms may be used where the funding requirement exceeds the grant’s cash limit.
- Under **TGC 1**, the cash limit is exceeded solely due to costs incurred as a direct result of changes made the TGCs, a case can be made to us for additional funds on an exceptional basis.
 - There is a mechanism in the TGCs to cover the additional cost of leave and extensions related to leave in **TGC 8.4**. The project lead should seek to meet the costs of leave for which UKRI is accountable from within the training grant or other contingency funds in the first instance, but where a project lead can demonstrate that they cannot meet the costs of leave from within the training grant or other contingencies other options are available, including moving the student to an alternative grant.

¹⁹ By underspend, we mean funds that would normally be returned to UKRI following the Final Expenditure Statement of the grant.



Disabled Students' Allowance (DSA) Framework costs

- 7.50 Chapter 4 sets out changes to DSA Framework. UKRI does not maintain student-level data on DSA centrally and we are aware of reports that indicate issues with uptake of DSA that go beyond the specific reforms outlined in this paper. Hence, to cost our changes to the UKRI DSA Framework we have taken the following approach:
- Over recent years the cost of providing UKRI's DSA Framework has increased from £0.37 million in financial year 2017-18 to £1.14 million in 2021-22²⁰.
 - Similarly, HESA data indicated that there has been a significant growth in the number of postgraduate research students declaring a disability, from 9% in 2017-18 to 14% in 2021-22. UKRI's own studentship data shows a similar trend of increased number of students declaring a disability. However, comparison of student records held by UKRI (reported to us by ROs through Je-S) with those held by HESA indicates that UKRI records show differences in disability reporting. For these cost estimates we have assumed that the rate of disability amongst UKRI students is the (higher) rate in HESA data, not the (lower) rate reported in UKRI's system. This indicates that if the rate of disability amongst UKRI students in 2021-22 matched that of HESA's full UK postgraduate research population, then of around 5,670 UKRI student starts in AY 2021-22, 1,165 of those would be disabled students.
 - Disability is a broad term with a number of possible definitions. Not every student with a physical or mental impairment will require an application under our DSA Framework. We estimate that if the rate of application for UKRI DSA matched SLC's scheme for English undergraduates, then 955 students would have made a DSA request in 2021-22.
 - We therefore use the average DSA provision to undergraduates and apply this to the number of students who could receive DSA. On this basis we assume that, were the rate and cost of UKRI DSA to match undergraduate DSA, then the cost of the scheme for 2021-22 would be £1,820,000, around £680,000 more than the current cost.
- 7.51 Overall we expect that the majority of the reforms to the UKRI DSA Framework in Chapter 6 will lead to greater take up of UKRI DSA, more consistent with the SLC DSA scheme for English undergraduates.
- 7.52 The removal UKRI's requirement for a diagnosis in the UKRI DSA Framework differs slightly from some other DSA schemes. The reform should allow ROs to operate more evidence in some circumstances. The main impact of the reform is expected to be that students receive their DSAs earlier and with less bureaucracy; we do not expect that reform alone to lead to a significant increase in the cost of DSA.
- 7.53 Note that under our DSA Framework we reimburse ROs directly (after receipt of a valid claim) so we expect no direct financial implications for ROs.

Benefits of proposed changes

- 7.54 In this section we discuss the benefits to the reforms.
- 7.55 **Reduction in termination.** In addressing issues that may lead to termination, we intend to reduce levels of disabled students terminating to be consistent with the wider student population, that is, from 13.3% to 9.1%. This improvement – retaining around 90 more

²⁰ Note these figures may be influenced by a range of factors. In particular, DSA payments were lower in 2020-21 than in the year before or after. It is possible that some costs that would have arisen in 2020-21 instead arose in 2021-22 due to delays caused by the Covid-19 pandemic. Nevertheless, there is a clear trend in the cost of DSA increasing over time.



students a year – is equivalent to around 2% of UKRI funded student starts each year. Though we are not currently in a position to provide an estimate, the measures might help reduce termination rates related to maternity, caring responsibilities and other issues.

- 7.56 **Reduction in late submission.** We currently estimate that around 80% of students submit their thesis or equivalent after the end of their funded period. Students reported as disabled on Je-S are 1.3 times more likely to submit over a year after the end of their studentship as compared to other students. Reasons for late submission are underexplored and we cannot currently provide an estimate, but improving support in the event of disability, ill health and pregnancy and in other circumstances, we expect to see a general reduction in late submission, and late submission by disabled students to fall in line with the wider UKRI funded population.
- 7.57 **Mental and physical health:** The EDI Caucus found that lack of support was contributing to some students' negative mental health, in some cases necessitating more sick leave (Richards, et al., 2024). We cannot currently quantify to what degree the policies under review are contributing to negative mental health, but other research (Hazel, et al., 2021) found that 15% of UK doctoral students had taken a break from their studies because of their mental health. We would expect to see the reforms proposed here contribute to a small improvement in the mental health outcomes of students who benefit from the changes. This has value as an outcome in its own right, as well as partially mitigating the cost of an increase in sick leave we might otherwise see.
- 7.58 **Consistency and compliance with standards:** the reforms will help provide a clearer framework for consistency and compliance. As UKRI is not a regulator we have not sought to quantify risks associated with these issues.

Section 94 statement

- 7.59 Section 94 of the Higher Education and Research Act (HERA) states that while exercising the power to give financial support to any person, UKRI must have regard to the desirability of not discouraging the person from maintaining or developing funding from other sources.
- 7.60 In making our changes we have considered carefully whether students are likely to receive the necessary support from alternative sources. Work we have commissioned from Advance HE and the EDI Caucus supports our assessment that the financial changes outlined above are not currently supported by other parties.
- 7.61 As UKRI funds around 20% of students and this funding is constrained to those students funded by us, we assess that the reforms are consistent with our approach to supporting postgraduate training.



Annex 1: List of abbreviations and other terms

Acas	Acas is an independent public body that receives funding from the government. It provides free and impartial advice to employers, employees and their representatives on employment rights, best practice and policies, and resolving workplace conflict. We have referred to Acas guidance in some places where discussing parallels with employment law.
Advance HE	Advance HE is a higher education charity that works with partners across the globe to improve higher education for staff, students and society. We commissioned Advance HE to review our training grant conditions from an EDI perspective.
CMA	The Competition and Markets Authority is an independent non-ministerial department that has regulatory powers for consumer and competition law. It works with other sector-regulators and will normally only intervene if it believes there is a systemic market problem. It also provides information and advice to people and businesses about rights and obligations under competition and consumer law.
CTF	Collective Talent Funding. UKRI's programme to join up all our talent investments so that they are simpler and more consistent.
DDA	Disability Discrimination Act. The DDA has largely been replaced by the Equality Act 2010 but is still in effect in Northern Ireland.
DSA	Disabled Students' Allowance. There are a number of DSA schemes in the UK, the most well-known of which are the schemes run for English, Welsh, Scottish and Northern Irish undergraduates respectively. UKRI has its own DSA Framework which allows ROs to recoup certain costs associated with providing disabled UKRI funded students with reasonable adjustments.
EDI Caucus	The EDI Caucus is a research project funded by UKRI. It provides high-quality research evidence on EDI that informs policy and practice in the R&I system. We commissioned the EDI Caucus to undertake research to support this work.
EDI	Equality, Diversity and Inclusion. You can discover more about UKRI's work to support EDI on our website .
EHRC	The Equality and Human Rights Commission is the regulator that enforces equality legislation regarding the protected characteristics in the UK.
FEC	Full Economic Cost. The FEC method is used for most research grants, hence these grants are sometimes known as FEC grants. For FEC grants, UKRI's research councils normally pay around 80% of the full economic cost of the research activity, with the RO providing the remainder. Different rates apply to Innovate UK grants. Training grants do not use the FEC method.
HEP	Higher Education Provider. The legal definition used in legislation and elsewhere to denote which organisations certain legal requirements apply to. HEPs are eligible to receive UKRI research council funding, as are some other kinds of organisation.
Je-S	The Joint Electronic Submission system is an online platform used by UKRI's research organisations for submitting applications for funding to our research councils, and for managing grants. It is being replaced by the Funding Service .



Medr	Medr is the regulator for further and higher education in Wales. Its full name is the Commission for Tertiary Education and Research.
OfS	The Office for Students is the regulator for higher education in England.
OIA	The Office for the Independent Adjudicator for Higher Education , an independent body set up to review student complaints in England and Wales. Other ombudsmen are available to students wishing to make complaints in Scotland and Northern Ireland.
OP	Operational Panel. A group of 30 experts drawn from the sector which we conveyed to advise us on this policy statement.
PGR	Postgraduate Research. PGR refers to the provision of training for a research degree, such as a PhD or MRes. Postgraduate research degrees are considered a distinct category, separate from postgraduate taught degrees.
PhD	Doctor of Philosophy. Also sometimes referred to as a DPhil. The PhD is the most common doctorate though UKRI also funds Professional Doctorates (ProfDocs) including Engineering Doctorates (EngD). For this reason, we tend to describe the qualifications supported by our training grants as simply “doctorates”.
QAA	The Quality Assurance Agency for Higher Education. The QAA sets standards and supports the higher education sector in meeting them.
RGC	Research Grant Condition(s). The standard terms and conditions for research grants – sometimes called full economic cost (FEC) grants. Like the TGCs, the RGCs are published on our website.
RO	Research Organisation. In more general usage, an RO is an organisation that is eligible to receive certain UKRI funding. However, in this policy statement we use the more specific meaning that is also used in the TGCs and RGCs, that is an RO is the organisation to which a UKRI grant is awarded and which takes responsibility for the management of the project and accountability for funds provided. The RO is responsible for ensuring that any training grant activity carried out by the RO, students, supervisors and any third parties complies with the TGCs (see TGC 2.1).
SLC	The Student Loans Company. A non-profit making government-owned organisation that administers loans and grants to students in colleges and universities in the UK, including some DSA schemes. Students who receive funding from a UKRI training grant are ineligible for SLC support.
TGC	Training Grant Condition(s). Where this is followed by a number it denotes a specific condition in the ‘Standard Terms and Conditions of Training Grant’. The TGCs are published on our website.
Training grant	A grant made from UKRI to an RO for the provision of postgraduate research training. UKRI will normally provide the RO with funding for the student’s fee, stipend and some other costs. Students are recruited and managed by the RO and/or other providers that it is partnering with. Training grants are governed by the TGCs and any specific conditions from the awarding council.



Annex 2: References

- Advance HE (prev. Equality Challenge Unit). (2012). Equality Act 2010: positive action through bursaries, scholarships and prizes. Retrieved from <https://advance-he.ac.uk/knowledge-hub/equality-act-2010-positive-action-through-bursaries-scholarships-and-prizes>
- Advance HE. (2023). *Equality impact assessment of UKRI's standard training grant terms and conditions*. Retrieved from UKRI.org: <https://www.ukri.org/publications/equality-impact-assessment-of-ukri-standard-training-grant-terms-and-conditions/>
- Bliss. (2024, April 9). Prematurity statistics in the UK. Retrieved from <https://www.bliss.org.uk/research-campaigns/neonatal-care-statistics/prematurity-statistics-in-the-uk>
- Bliss. (n.d.). *Prematurity statistics in the UK*. Retrieved 05 1, 2024, from bliss.org: <https://www.bliss.org.uk/research-campaigns/neonatal-care-statistics/prematurity-statistics-in-the-uk>
- BUFDG. (2022). *Stipends, bursaries, scholarships, etc.* Retrieved from BUFDG.ac.uk: <https://bufdg.ac.uk/resources/news/view?g=097cc003-cda8-4cb3-a161-749c9d8a9f02>
- CIPD. (2022). *Employer Focus on Working Parents: Parental leave and pay and childcare policies*. Retrieved from https://www.cipd.org/globalassets/media/knowledge/knowledge-hub/reports/employer-focus-on-working-parents-report_tcm18-111075.pdf
- CMA. (2015, 07 31). Unfair contract terms explained. Retrieved from https://assets.publishing.service.gov.uk/media/5a807f4c40f0b62302693daf/Unfair_Terms_Explained.pdf
- CMA. (2023). *Higher education: consumer law advice for providers*. Retrieved from Gov.uk: <https://www.gov.uk/government/publications/higher-education-consumer-law-advice-for-providers>
- Disabled Students' Commission. (2023). *The Disabled Student Commitment*. Retrieved from Advance-he.ac.uk: <https://www.advance-he.ac.uk/knowledge-hub/disabled-student-commitment>
- Disabled Students UK and Pete Quinn Consulting. (2023). *Improving the experience of disabled PhD students in STEM*. Disabled Students UK. Retrieved from <https://disabledstudents.co.uk/research/phd-report/>
- DWP. (2019, July 15). Health in the workplace: patterns of sickness absence, employer support and employment retention. Retrieved from <https://www.gov.uk/government/statistics/health-in-the-workplace-patterns-of-sickness-absence-employer-support-and-employment-retention>
- EHRC. (2014, 04 01). *Equality Act 2010 Technical Guidance on Further and Higher Education*. Retrieved from equalityhumanrights.com: <https://www.equalityhumanrights.com/equality/equality-act-2010/technical-guidance-further-and-higher-education>
- EHRC. (2024, 07 10). *Advice note for the higher education sector from the legal case of University of Bristol vs Abrahart*. Retrieved from <https://www.equalityhumanrights.com/guidance/advice-note-higher-education-sector-legal-case-university-bristol-vs-abrahart>
- Forbes, S., Birkett, H., & Smith, P. (2021). *What motivates employers to improve their Shared Parental Leave and pay offers?* Government Equalities Office. Retrieved from <https://www.gov.uk/government/publications/what-motivates-employers-to-improve-their-shared-parental-leave-and-pay-offers/what-motivates-employers-to-improve-their-shared-parental-leave-and-pay-offers#executive-summary>



- Hazel, C., Niven, J. E., Chapman, L., Roberts, P. E., Cartwright-Hatton, S., Vakeix, S., & Berry, C. (2021). Nationwide assessment of the mental health of UK Doctoral Researchers. *Humanities and Social Sciences Communications* 8, 305. Retrieved from <https://www.nature.com/articles/s41599-021-00983-8>
- HESA. (2022, 10 05). Data Futures student return: Student 2021/22 - Suspension of active studies. Retrieved from <https://www.hesa.ac.uk/collection/c21051/a/NOTACT>
- Johnson, C., Rossiter, H., Cartmell, B., Domingos, M., & Svanaes, S. (2019). *Evaluation of disabled students' allowances: research report*. Social Science in Government. Retrieved from <https://www.gov.uk/government/publications/evaluation-of-disabled-students-allowances-dsas>
- Neonatal Care (Leave and Pay) Act. (2023). Retrieved from <https://www.legislation.gov.uk/ukpga/2023/20>
- OfS. (2022, November 24). Securing student success: Regulatory Framework for higher education in England. Retrieved from <https://www.officeforstudents.org.uk/publications/regulatory-framework-for-higher-education-in-england/>
- OfS. (n.d.). *Funding programme to improve access and participation for black, Asian and minority ethnic students in postgraduate research*. Retrieved 07 15, 2024, from [officeforstudents.org.uk: https://www.officeforstudents.org.uk/for-providers/finance-and-funding/pgf-funding-programme-improving-access/](https://www.officeforstudents.org.uk/for-providers/finance-and-funding/pgf-funding-programme-improving-access/)
- OfS. (n.d.). *The regulatory framework for higher education in England*. Retrieved from [officeforstudents.org.uk: https://www.officeforstudents.org.uk/for-providers/regulatory-resources/the-regulatory-framework-for-higher-education-in-england/](https://www.officeforstudents.org.uk/for-providers/regulatory-resources/the-regulatory-framework-for-higher-education-in-england/)
- OIA. (2018, April). Rules of the Scheme. Retrieved from <https://www.oiahe.org.uk/about-us/our-scheme/our-rules/>
- OIA. (2019, February). Putting Things Right. Retrieved from <https://www.oiahe.org.uk/media/01wf2fmb/putting-things-right-february-2019.pdf>
- OIA. (n.d.). *oiahe.org.uk*. Retrieved from Good Practice Framework: Principles: <https://www.oiahe.org.uk/resources-and-publications/good-practice-framework/principles/>
- ONS. (2023, February 13). Unpaid care by age, sex and deprivation, England and Wales: Census 2021. Retrieved from <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021>
- ONS. (2024, February 23). *Births in England and Wales: summary tables*. Retrieved 05 01, 2024, from [ONS.gov.uk: https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsummarytables](https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsummarytables)
- ONS. (2024, February 23). Births in England and Wales: summary tables. *2022 edition*. Retrieved from <https://www.gov.uk/government/statistics/health-in-the-workplace-patterns-of-sickness-absence-employer-support-and-employment-retention>
- OU. (2024, August). Research Degree Regulations. Retrieved from <https://help.open.ac.uk/documents/policies/research-degree-regulations>
- Oxford University Innovation Ltd v Oxford Nanoimaging Ltd, EWHC 3200 (In The High Court of Justice Business & Property Courts of England & Wales Intellectual Property List (Ch D) Patents Court 2022). Retrieved from <https://www.bailii.org/ew/cases/EWHC/Patents/2022/3200.html>



- QAA. (2020). *Doctoral degree characteristics statement*. Retrieved from qaa.ac.uk: <https://www.qaa.ac.uk/the-quality-code/characteristics-statements/characteristics-statement-doctoral-degrees>
- QAA. (n.d.). *UK Quality Code for Higher Education 2018*. Retrieved 06 01, 2024, from QAA.ac.uk: <https://www.qaa.ac.uk/the-quality-code/2018>
- Richards, J., Sang, K., Napier, J., Lin, D., Wedgwood, B., & Kennedy, R. (2024). *An appraisal of changes to the UKRI Standard Terms and Conditions of Training Grant for disabled and carer doctoral students: Mode of study, challenges, drivers and mitigation of challenges, and the suitability of training grants to address these challeng*. Equality, Diversity and Inclusion Caucus (EDICa). Retrieved from <https://www.ukri.org/publications/edi-caucus-appraisal-of-the-ukri-training-grant-conditions/>
- SQW. (2025). Understanding the effect of UKRI stipend levels on UKRI studentships. UKRI. Retrieved from <https://www.ukri.org/publications/understanding-the-effect-of-ukri-stipend-levels/>
- The Paternity and Adoption Leave Regulations. (2002). Retrieved from <https://www.legislation.gov.uk/uksi/2002/2788/contents>
- The Shared Parental Leave Regulations. (2014). Retrieved from <https://www.legislation.gov.uk/ukdsi/2014/9780111118856/contents>
- Tickell, A. (2022). *Independent review of research bureaucracy: final report*. Retrieved from gov.uk: <https://www.gov.uk/government/publications/review-of-research-bureaucracy>
- Tommy's. (n.d.). *Baby loss statistics*. Retrieved June 2024, from Tommy's: <https://www.tommys.org/baby-loss-support/pregnancy-loss-statistics>
- UKRI. (2020). *Preventing harm (safeguarding) in research and innovation policy*. Retrieved from ukri.org: <https://www.ukri.org/publications/preventing-harm-safeguarding-in-research-and-innovation-policy/>
- UKRI. (2022). *UKRI strategy 2022 to 2027: transforming tomorrow together*. Retrieved from <https://www.ukri.org/publications/ukri-strategy-2022-to-2027/>
- UKRI. (2023). *Analysis of the new deal for postgraduate research call for input*. Retrieved from UKRI.org: <https://www.ukri.org/publications/analysis-of-the-new-deal-for-postgraduate-research-call-for-input/>
- UKRI. (2023, September 26). *New deal for postgraduate research: response to the call for input*. Retrieved from UKRI: <https://www.ukri.org/publications/new-deal-for-postgraduate-research-response-to-the-call-for-input/>
- UKRI. (2024, January). *Statement of expectations for doctoral training*. Retrieved from UKRI.org: <https://www.ukri.org/publications/statement-of-expectations-for-doctoral-training/>
- UKRI. (n.d.). *UK Research and Innovation training grants: standard terms and conditions of training grant*. Retrieved from UKRI.org: <https://www.ukri.org/publications/terms-and-conditions-for-training-funding/>
- University of Bristol v Dr Robert Abrahamart, KA-2022-BRS-000012 (High Court of Justice, King's Bench Appeals, Bristol District Registry February 14, 2024). Retrieved from <https://www.judiciary.uk/judgments/the-university-of-bristol-v-dr-robert-abrahamart/>