



COVID-19 (Coronavirus) response

Issue

1. This paper provides an update to the board on our regulatory response to coronavirus (COVID-19) since the date of the last board meeting on 9 April 2020.

Recommendations

2. The board is asked to note the following developments and programmes of work:
 - The OfS consultation on the proposed condition of registration to protect the interests of students and the stability and integrity of the sector, including during this summer's admissions processes, published on 4 May 2020, alongside the package of measures announced by the Secretary of State for Education on 4 May 2020;
 - Provider financial sustainability;
 - Ongoing work to protect student interests during the pandemic;
 - Transitioning from the pandemic to 'the new normal'.
 - OfS operations.
3. The board is asked to agree the following delegations to the chair, deputy chair, chief executive and director of competition and registration (or by as many of them have capacity in the event of ill-health):
 - Consider responses made to the consultation on the proposed regulatory condition, and other relevant factors
 - Decide whether to impose a new condition of registration, and if so, the date on which it should take effect
 - Make any drafting changes to the proposed condition and regulatory framework guidance as a result of consultation responses
 - Agree a summary of consultation responses to be published
 - Agree the equality impact assessment to be published alongside the outcomes of the consultation.
4. The board is also invited to agree that it will meet for a special meeting in early June 2020 and, as part of that agenda, it would wish to discuss the themes emerging from the consultation.

5. Finally, the board is invited to note in Annex A a summary of the responses to coronavirus of higher education systems around the world.

Further information

6. Available from Nicola Dandridge (nicola.dandridge@officeforstudents.org.uk).

Members interests

7. This paper covers policy areas that directly affect higher education providers, so any member of the board with a registered interest in a higher education provider as listed here: www.officeforstudents.org.uk/about/who-we-are/our-board-and-committees, is considered to have an interest in the contents of this paper. In particular, the following members are considered to have an interest:
 - Verity Hancock
 - David Palfreyman
 - Monisha Shah
 - Steve West
8. These interests have been noted and, although relevant, have been deemed not to create conflicts as no decisions are being taken. These members can receive papers and partake in the discussion as normal.

Paper publication

9. This paper and its annexes cover policy in development and are therefore exempt from publication.

Proposed new regulatory condition

10. At the 9 April 2020 board meeting, the board discussed and expressed support for proposals to consult on the introduction of a new time-limited condition of registration ('Condition E6'), with the final decisions on whether or not to consult and on the terms of the consultation being delegated to the chair, deputy chair, chief executive and director of competition and registration. Those decisions were made on 26-27 April 2020 and the consultation document was [published](#) on 4 May 2020, alongside a package of measures from the Department for Education. The package of measures, combined with the consultation, supersedes the extended moratorium on offer-making activity announced by the Minister in March 2020.
11. The consultation will be open until 26 May 2020, and we intend to analyse the responses immediately after the consultation closes with a view to publishing our decision and any new condition in June 2020.
12. The consultation contains a proposal that the condition should capture relevant conduct of a provider that falls after 11 March 2020 (the date on which the WHO declared a global pandemic) where that conduct forms part of a continuum of events. This would mean, for example, that unconditional offers made before any condition was in force could be within scope.
13. The proposed scope of the condition is broad, extending to conduct that is not in students' interests or threatens the stability or sustainability of the sector. It also reflects our normal principle-based approach to regulation. The scope of the condition will be considered further in the light of the consultation responses.
14. The board is invited to note the current position regarding the consultation on the proposed new condition of registration and agree to the decision-making process outlined in paragraph three above.
15. Aside from the consultation, board members will have seen that the package of measures from the DfE included the following additional measures:
 - A proposed Student Number Control (SNC) mechanism that limits the number of students that a provider can recruit for 2020/21 to forecast numbers plus 5%, to be operated by the DfE
 - 10,000 additional places (including 5,000 nursing places) that are exempt from the proposed SNC
 - Changes to UCAS's clearing model to allow greater flexibility in students' choices, plus enhanced IAG for students
 - Reference to OfS flexibility regarding student hardship funds
 - A commitment to supporting the sector's international student strategy
 - Reprofiting of SLC payments to front-load payments in the 2020-21 academic year (25%, 25%, 0%, 50%) with the first two payments expected in October
 - Reprofiting of £100m quality-related research funding into this academic year (2019/20)
 - Potential government support for restructuring regime, with conditions.

16. In relation to the proposed restructuring regime, we are involved in discussions with the DfE, as to how we would respond if a provider ran into financial difficulties, and what each of our responsibilities would be. These circumstances might arise either because a provider signalled to the OfS or the DfE that they were facing financial difficulties, or because the OfS identified concerns about financial pressures from its own monitoring processes. Either way, as was clear from the DfE's announcement, government is not proposing an open-ended funding commitment. Indeed the announcement made no explicit reference to the availability of funding, and any financial support from the DfE is likely to be contingent on conditions requiring restructuring or reconfiguration that ensures the provider, or selected elements of the provision, are sustainable into the longer term.
17. If funding were to be provided by the DfE, it would be essential that the DfE and OfS work closely together so that the OfS's regulatory powers (for instance Condition D relating to financial viability and sustainability and Condition C3 relating to student protection plans) were aligned with DfE interventions, without fettering the OfS's decision-making.

Financial viability and sustainability

18. The impact of coronavirus on the finances of providers and the sector was discussed at the April board meeting. The board paper for that meeting outlined the various assumptions that underpinned our financial modelling, and the steps that we were taking to try and secure clarity on financial options, particularly in relation to providers being able to access the government loan schemes.
19. Since then, we do now have greater clarity regarding the government's support packages in that the DfE have confirmed that providers will be eligible to apply to the Job Retention Scheme (the furlough arrangements) in relation to non-publicly funded staff; the Coronavirus Business Interruption Loan Scheme (CBILS), the Coronavirus Large Business Interruption Loan Scheme (CLBILS); and the Covid-19 Corporate Finance Facility (CCFF). The three loan schemes provide access to finance so assisting with short term liquidity. They do not offer grants, so the repayment terms may create financial pressures in future years. However, they do allow time for adjustment and recalibration of business models.
20. Exempt from publication.
21. Meantime, we are monitoring provider financial viability and sustainability closely. The initial assumptions shared with the board in April set out a low, medium and high impact set of assumptions regarding sustainability, depending on 28 separate income sources, of which by far the most significant is the income stream from international students. The low impact model assumed a reduction of 20% in international student recruitment in 2020/21. Although at this stage it is impossible to predict what decisions international students are likely to take, it seems likely that a 20% reduction is too optimistic. We will continue to refine our assumptions as the evidence of the impact of the pandemic starts to become clearer over the next weeks and months. This includes engaging with the British Council with regards to their surveys of prospective international students.

22. On the basis of modelling our current assumptions, we have identified a small number of providers potentially at increased risk of market exit in the next three months. We are in the process of engaging with these providers to understand the mitigations they have in place. Based on initial discussions most providers are taking steps to secure finance and cut costs and so may well avoid market exit. Two providers have flagged to us that their liquidity is likely to drop below 30 days within the next three months, but again they are taking active steps to secure additional borrowing. We are in close engagement with those providers, and the Provider Risk Committee has been kept informed.
23. Although we have signalled to providers that we are reducing our regulatory requirements on them during the coronavirus pandemic, this will obviously not extend to reducing our oversight in relation to financial viability and sustainability.

Protecting students' interests during the pandemic

24. The impact of the current lock-down on current students is severe, with all face-to-face tuition now cancelled and teaching instead taking place on line, where that is possible. Many students are working in unsatisfactory circumstances from home, some suffering from lack of space to work and lack of necessary IT equipment, and some financially exposed having lost part time jobs. Not all tuition can be successfully replicated on line, particularly in relation to laboratory and performance based courses.
25. We signalled to providers on 23 March 2020 that we would reduce the regulatory burden on providers by suspending some requirements to reflect the intense pressures that providers were under during the coronavirus period. However, this has to be balanced against the severe prejudice being experienced by students. On 3 April 2020 we published guidance covering our expectations in relation to quality of courses and student support, securing the standard of qualifications and credit, and (in outline) consumer protection arrangements. We also wrote to providers on 7 May 2020 with [guidance](#) on our expectations in relation to Prevent, and we are shortly proposing to publish further guidance on student and consumer protection. This is likely to cover issues such as refunds and our expectations about the information providers should make available about the way courses may be delivered in 2020-21.
26. We are acutely aware that some groups of students will suffer more from the impact of coronavirus, particularly those the government has identified as vulnerable. This includes students suffering from coronavirus or who need to self-isolate, international students, and students unable or less able to access remote learning for whatever reason, together with care leavers, those estranged from their families, and students with disabilities. We know also that many of the students we have identified as priorities for our access and participation work - which extends throughout the lifecycle from schools outreach to admissions decisions, academic and pastoral support on course and transition into work - face particular challenges at this time, including financial hardship, risks to health and wellbeing, access to IT, the loss of established advice and support structures, and reduced prospects for graduate employment.
27. Through our revised regulatory requirements, we have made clear that providers should continue to seek to deliver their access and participation plans. We do not

expect to see a reduction in the level of ambition and rigour within these plans across the five-year period agreed for their delivery. We have also made clear that the financial support that has been promised to students within plans should continue to be honoured. Alongside this, we have acknowledged that some aspects of access and participation plans such as face to face outreach in schools cannot currently be delivered. We have advised that providers may use funding previously earmarked for outreach, together with the funding they receive through the student premium element of our teaching grant, to support the groups of vulnerable students identified by the government, including in relation to financial hardship and mental health.

28. Some of the areas where students are suffering most disadvantage are ones where our regulatory powers do not extend – for instance in relation to accommodation. However, we can highlight examples of innovative practice and useful case studies, and therefore published a [Briefing Note](#) on student accommodation on 22 April 2020 which identifies the ways in which universities, colleges and others are supporting the accommodation needs of their students during the outbreak, and signposts to sources of advice and information. On 30 April 2020, we published a similar [Briefing Note](#) on student mental health, both documents were prepared in close collaboration with the sector and stakeholders. We published on 14 May a further [Briefing Note](#) on the needs of students without family support and further briefings on international students, students with disabilities, postgraduate research students and graduate employment will follow.
29. We have been providing advice to Ofqual on its consultation for this year's exceptional arrangements for grading A-levels and other qualifications. While we consider the proposals overall to be a robust response to an exceptional situation, we have advocated particular consideration of the impact of the proposed arrangements on students from under-represented or protected equality groups. These students can be outliers within their schools and make rapid progress at a relatively late stage. It will be essential, therefore, that their outcomes are not underestimated within the statistical method used by Ofqual and that providers consider the context for their awards when they make admissions decisions.
30. We are also working with Uni Connect partnerships to agree new modes of outreach for this year, building wherever possible on platforms that have been evaluated to demonstrate their effect. This involves shifting from face to face to online modes of engagement, whilst sustaining as far as possible the tailored and one to one modes of support that have proved successful in recent years. Partnerships are sharing common challenges and approaches with each other and we are allowing them to work across a wider range of students and areas, given the particular imperative to support year 13 students with their choices and the reach of the approaches now being deployed.
31. We have ensured that Discover Uni is providing regularly updated information for prospective and current students across the UK on the impact of coronavirus, on topics such as changes to their examinations, application and admission arrangements, student finance and study tips for those working at home, with links to primary sources of information. These updates are being actively promoted through our student-facing social media. We have also made improvements to the Discover Uni site, improving search function, responsiveness and adding OfS and funding body logos, following user testing. Further user testing on the overall look and feel of the site is due to start shortly.

32. We are working closely with members of our IAG advisory group, including UCAS, The Student Room and networks of careers advisors and teachers to ensure students and advisers can continue to access good quality IAG.
33. The National Student Survey (NSS) 2020 commenced on 6 January and ran until the 30 April 2020. Given that the majority of the survey period was undertaken before the current coronavirus restrictions began, the decision to continue running the survey has been under constant review in conjunction with the other UK funding and regulatory bodies and Ipsos Mori. Many students had responded to the survey prior to the pandemic, and our decision to continue with the survey had been influenced by the desire to offer all other eligible students the opportunity to respond if they wished to do so.
34. Student wellbeing was paramount in informing our approach, during the survey we were actively monitoring students' reactions to being asked to complete the survey; these were very positive on the whole, with many students welcoming the opportunity to provide feedback.
35. To ease the burden on universities and colleges who are administering the survey, we did not require them to do any additional promotional activity to drive up response rates as we would usually expect during the latter stages of the survey period. This may have had a slight impact on response rates. We will analyse the data once we receive it to assess what impact the pandemic has had on student responses. This analysis will inform our plans for publication which will aim to ensure that any comparisons between providers or years are reasonable and not likely to mislead students about the underlying quality of provision.
36. Preparations for piloting of an all years NSS continue. The planned consultation is currently on hold, but the groundwork is being prepared and options are being explored for what a post coronavirus pilot might look like. Results from an early research phase of a postgraduate taught survey last year are being analysed, with recommendations for future activity to be included within a wider paper on options for the post coronavirus all years NSS for the board in July.

Transitioning from the pandemic to a new normal

37. Alongside our work on responding to coronavirus, we are also developing a programme of work mapping out how we should return to the new post-pandemic normal. We are keen to manage the transition back to our existing regulatory relationship with the sector, while acknowledging that the external environment will have changed.
38. This programme of work will consider how and when we should reimpose our normal regulatory requirements in a phased way that allows providers time to prepare and adapt, and does not impose inappropriate regulatory burden. We are not therefore planning to reintroduce all our suspended consultations all at the same time, and some in any event may need amending in the light of coronavirus related developments (for instance the admissions consultation). It is also likely that we will phase in our requirements so that although some of our previous regulatory requirements will be switched back on, other coronavirus measures will be maintained in place for the time being. We may also wish to review some of our previous requirements before re-imposing them.

39. Alongside this exercise, we are also conducting a scenario planning exercise to anticipate what changes we will need to make to accommodate what will undoubtedly be a new normal: potentially more digital and on-line learning, less international travel, fewer international students, a harsher graduate recruitment market, and so on. That process will feed into our transition programme. It will also segue into our work for a new OfS strategy from April 2021 that will start this summer and will be on the agenda for the planned board away day in September (which may take place in person or virtually).

OfS operations

40. OfS staff continue to work remotely, with additional support in terms of advice and guidance on working from home, and additional mental health and welfare support available. We are starting to consider what returning to office-working might look like, in line with government guidance. However, it is clear that allowing offices, such as the OfS, to return to office-based working will not be a government priority. We are therefore assuming continued remote working for the time being.

41. Following the office closure there continued to be weekly all-staff briefings, and regular communication on coronavirus and related issues (such as mental health and wellbeing). Staff were able to collect equipment from the office (including chairs, monitors, etc) in a controlled way, and mandatory e-learning on ergonomics of home working made available. The directors' group initially met daily and then moved to twice weekly, with our operational Incident Management Team (IMT) originally meeting three times a week and now weekly.

42. As part of the response to coronavirus a business continuity dashboard, continuously updated, provides key information around business continuity, focussing on 'delivery', 'people' and 'technology':

- Delivery: in general capacity is good, with overall capacity at 90% of full. Some staff report being under-utilised and active re-deployment into high priority work is underway.
- People: overall sickness levels are low with a small number of coronavirus sickness and special leave cases, as well as increasing mental health issues. Annual leave data shows a trend of staff not taking leave. Managers have been asked to encourage staff to take leave for their own wellbeing and the future policy for carry-over is being considered.
- Technology: homeworking has driven a spike in the use of collaboration tools (MS Teams) and the network. All systems have shown resilience and are operating well within capacity.

43. One of our tenants in Bristol, CareUK, has continued to operate given that they deliver the '111' service. At the end of April they had 20 staff tested positive for coronavirus, following which a deep clean was carried out in the area they use (one floor in Nicholson House). The news was picked up by local media. A small number of OfS staff had been in the building, albeit not on the floor occupied by CareUK. We consider that the risk of our staff having been exposed to coronavirus during their brief visits to be very low. We are providing support to those staff potentially affected.

44. We are undertaking a 'lessons learned' exercise in relation to our coronavirus response, focusing on both operational and policy aspects. An update on our business continuity plans is being discussed at the Risk and Audit Committee on 15 May 2020.

Annex A: An international perspective on the responses of higher education systems to coronavirus (COVID-19)

1. The purpose of this annex is to give an overview of actions taken by other countries in relation to their higher education systems during the coronavirus pandemic. A particular focus is placed on those countries that have had more time to develop policy responses to the pandemic (e.g. Australia and South Korea), and on countries that are beginning to make the transition out of lockdown.
2. This annex is divided into 4 sections. Section 1 outlines how higher education sectors in countries other than the UK are navigating the transition out of lockdown, Section 2 details changes to regulatory actions and approaches, and Section 3 outlines the changes that other countries have made to the financial support available for students.
3. The information in this paper was updated on 11 May 2020, but events are likely to have developed further since then. For up to date information on the spread of coronavirus in the countries discussed in this annex, the Financial Times coronavirus tracker is a useful resource (<https://www.ft.com/coronavirus-latest>), as is the *Johns Hopkins University Coronavirus Resource Center* (<https://coronavirus.jhu.edu/>). Where background information about the severity of the coronavirus outbreak in a country is relevant, this information has been given. These resources will also be helpful if you wish to read more about how the countries discussed in this annex have responded to coronavirus.

How higher education sectors in other countries are transitioning out of lockdown

Summary

4. In countries that are beginning to ease lockdown, the order of reopening education systems has broadly been based on the age of students, with the youngest children being the highest priority for a return to in-person teaching. Even where primary and secondary schools have reopened, universities have typically remained closed and remain so for the foreseeable future. Part of the reason for this is that international organisations giving advice on the educational response have stressed that universities are better equipped than schools to teach at a distance.¹

Spain

5. The situation varies regionally: Universities in Madrid (the area with the highest density of cases) will remain closed until end of this academic year. In less affected areas providers are planning a phased return of students and researchers beginning in early June. The academic year is likely to be extended until July and some students may still sit exams or conduct lab work in September. This may mean that the start of the next academic year will be delayed.

Norway

6. Context: The impact of coronavirus has been relatively minimal. As part of its easing of lockdown restrictions, schools, technical colleges, and universities will partially reopen from 27th April. However only university students who are (a) near the end of their studies and (b) have a need to be physically present at their provider may return. The latter category includes

¹ <https://www.timeshighereducation.com/news/universities-last-line-europe-eases-coronavirus-lockdown>

nursing and medical students, those studying art, performance, music, media, and design, and those studying maths and technological subjects.

South Korea

7. Context: Aggressive contact tracing has kept numbers of those infected with coronavirus relatively low. Social distancing measures are in place for the time being until the situation stabilizes further. Schools have postponed the start of the 2020-21 academic year for 5 weeks but have now started term with online teaching beginning on 9th April.
8. The response of the higher education in South Korea has been varied. Due to intense student pressure to issue tuition fee refunds (more details below) if all teaching is to take place online for the summer semester, some universities have now announced plans to resume face to face classes. For example, Korea University in Seoul announced last week it would offer both online and offline lectures from 11 May, and Seoul National University is preparing to resume some classes from 4 May starting with subjects that require practical experience or laboratory experiments.
9. Some commentators have expressed dismay at the lack of government guidance, which, they argue, has meant that providers are being placed in uncomfortable situation where they are forced to make difficult decisions about how to balance public safety with student pressure to either return to face-to-face classes or refund tuition fees for this term.
10. Student satisfaction with online learning provision is very low: A survey of almost 22,780 students at over 200 Korean universities conducted by the National University Student Council Network (Univnet) found recently that 99% of respondents wanted a full or partial refund of fees for the spring semester. Of those demanding a refund, 82% said the reason was because “remote classes are not up to par”, while 72% also cited not being able to use university facilities.² This has led to a petition to the country’s Constitutional Court to set a legal basis for reducing tuition fees in a time of crisis.

Czech Republic

11. Context: Impact of coronavirus has been relatively minimal; 258 deaths at time of writing. The Czech Republic will partially reopen universities for final year students from April 20th and schools and colleges will allow students preparing for final exams to attend classes from May 11th, with exams to be held from June.

Denmark

12. Children up to age 11 returned to school on 15th April. Universities closed until at least 10th May and teaching has moved online where possible. An exception has been made for final year medical students who have been allowed back to study.

Germany

13. Steps being taken to reopen schools, with schoolchildren facing leaving exams and final-year primary school pupils starting to return to class from 4 May.

² <https://www.universityworldnews.com/post.php?story=20200501085528893>

14. Universities to remain closed for foreseeable future and teaching has moved online where possible. No confirmation yet of when universities will reopen, although labs, archives and libraries can reopen, subject to distancing regulations. The academic body advising the German government on how to ease lockdown has recommended that since older learners can cope better with distance courses, younger pupils should be prioritised for physical teaching.

Austria

15. Schools to reopen in a limited way from 14th April, but universities to remain physically closed for this academic year. There is a possibility that they will reopen for examinations and laboratory work in the early summer.

Japan

16. Japan, like many East Asian countries, starts its academic year in April. As a short-term measure, postponing the start of the year by a few weeks has proved helpful, but the spring break has still not given providers much time to develop their online learning capabilities. UK universities facing this challenge in September will at least be able to capitalise on the long summer holiday to develop and improve their online teaching capabilities.
17. Most Japanese universities (78.9%) have chosen to postpone the start of the academic year (typically begins in April). According to a survey conducted at the end of March, 65.8% of state-run universities and 35.9% of private universities and junior colleges in Japan will introduce remote teaching.
18. In those campuses that are open, student clubs have been banned from holding welcome events. Spring graduation ceremonies in Japan have been cancelled, but students at Business Breakthrough University in Tokyo were able to attend remotely by controlling avatar robots while logged on at home.

Changes to regulatory actions and approaches

Australia

19. The higher education regulators (TESQA) has announced that registration fees that providers would have paid have been waived for 2020 and the first half of 2021 and will be refunded if already paid. TESQA have also announced that shift to a more flexible regulatory approach, and have published a collection of online resources to assist providers with the transition to online learning.³

India

20. University Grants Commission (statutory body that regulates higher education) has asked providers to set up mental health helplines monitored by counsellors and trained faculty members.

³ <https://www.teqsa.gov.au/latest-news/articles/coronavirus-covid-19-latest-regulatory-advice>

Changes to financial support available to students

New Zealand

21. New Zealand's government has announced a \$133 million tertiary education support package to help domestic students continue their courses during the coronavirus pandemic. The measures include:
 - a. temporarily increasing the student loan amount for course-related costs for full-time students from NZ\$1,000 to NZ\$2,000;
 - b. continuing support payments for students unable to study online for up to eight weeks;
 - c. and making changes to ensure that partial tuition refunds due to coronavirus do not affect future eligibility for student loans.
22. Internet service providers have reached an agreement with the Ministry of Education to provide six months of free broadband (with unlimited data) for 10,000 families of school-aged children who do not currently have home internet.
23. 17,000 free computers are being given out to low-income families and two educational television channels are being launched in an all-out drive to help children learn at home while schools are closed.

Canada

24. The Canadian government have announced a CA\$9 billion support package for students (c.£5 billion). The primary focus is on supporting students who have lost the income they would have got from summer jobs.
25. There is a 'Student Benefit' of CA\$1250 per month (c.£700) for unemployed students and recent graduates from May to August, going up to CA\$1750 for disabled students or those taking care of dependents. They have also announced a 'Canada Student Service Grant' that will give students who volunteer this summer up to CA\$5000 (c.£2900) towards tuition fees for next year.⁴
26. Canadian colleges and universities have asked the federal government to allow international students, who contribute an estimated CA\$6 billion (US\$4.3 billion) a year in tuition at universities, to change regulations that stipulate that international students must attend most classes in person to receive a Post-Graduation Work Permit. The government have now made changes that mean that online learning will not impact eligibility for a work permit, but these changes only apply to the summer semester. There are concerns from the sector that if lockdown continues into autumn (when most international students join) and online teaching continues, then there are currently no guarantees that once these students complete their studies, they will be able to secure work permits.

⁴ It is worth noting that the average cost of 1 year of UG tuition for domestic students is CA\$6,463 per year (c.£3700). Around two thirds of students have a part time job and of these, 75% said they had the job to pay for tuition fees (according to a 2012 survey).

Australia

27. In Australia, the government will guarantee state funding for universities at their current levels of enrolment for the rest of 2020 – if they enrol fewer students, the funding will not drop below December 2019 levels.
28. The government will give extra funding to providers to assist with the delivery of online short courses for those who have been economically impacted by coronavirus – for example, those who have become unemployed. The following details have been announced about these courses:
- a. They will start in May and will last for 6 months.
 - b. The courses are in areas perceived to be of high priority to the post coronavirus economy – for example, nursing, IT, agriculture.
 - c. Students completing these courses will receive a 'higher education certificate'. Fees will range from A\$1,250 to A\$2,500 (about half of what students would normally be charged).
 - d. These courses will only be available to new students and not to students already enrolled on higher education courses.
29. It is worth noting that the government support focuses primarily on support for domestic students, and the government will *not* support providers with the loss of income they have suffered due to reduction in international student recruitment.
30. The response of the higher education sector to these measures has been broadly positive, with the representative body Universities Australia describing the funding guarantee as a 'good first step'. However, some commentators have made the point that because only a minority of higher education providers have suffered reduction in domestic student recruitment, the package fails to address far more significant problem of the loss of international student income. Political factors are likely to have played a role here as there is a commonly held view that providers have consistently failed to heed warnings about over-reliance on international student recruitment (particularly in relation to Chinese students).

Germany

31. The government will provide emergency loans for students whose source of income is threatened by the coronavirus pandemic but are not entitled to federal grants. From 8 May, German students will be able to apply for an initially interest-free loan. Loans will comprise up to €650 a month and will be available interest-free for German students up to March 2021. International students can apply for the loan as of July 2020.