

Falling Short:

Response to UKRI's Phase 1 and Phase 2
Support for PhD researchers During the
COVID-19 Pandemic

Pandemic PGRs
Feb 2021

Ellie Munro

Sean Heath

Assorted Pandemic PGRs

With thanks to the members of
UKRI's Research Council
Peer Review Colleges
and
Advisory Councils

Contents

Executive Summary	2
Inadequate Support for Postgraduates Hit by a Crisis	3
No Real Action on Equality	3
Ignoring the Voices of Researchers	4
Recommendations for UKRI (RRI)	5
Recommendations for Government (RG)	6
Recommendations for Universities (RU)	6
1. Introduction	8
2. Inadequacies in Support	12
2.1 A Last Resort That Falls Well Short	13
2.1.1 Limiting Conditions for Support	14
2.1.2 Lack of Transparency	15
2.2 Halting High Quality Research and Successful Careers	16
2.2.1 Continued Lack of Access to Facilities	16
2.2.2 Lack of Access to Other Opportunities	17
2.2.3 Poor Understanding of Mental Illness in the PGR Community	17
2.2.4 Disadvantaging the Current Cohort	18
2.3 Inconsistencies in UKRI's own Research	19
2.3.1 Misrepresenting Researchers' Views	20
2.3.2 Discrepancies on the Ground	21
2.3.3 Poor Communication	21
2.3.4 Missing out Key Reasons for Disruption: Bereavement and 'Time Lost'	22
2.4 Conclusion	23
2.5 Recommendations	24
3. Impact on Equality	26
3.1 An Inadequate EIA	27
3.2 No Real Action for Disabled, Chronically Ill and Neurodiverse PGRs	29
3.2.1 Ongoing Problems with Sick Leave and Leaves of Absence	29
3.2.2 Problems with Phase 1: Disabled Researchers Missing Out	30
3.2.3 No Consideration of Intersecting Identities	32
3.2.4 Disabled Students Allowance: Not Fit For Purpose	32
3.3 Little Support for Parents and Carers	33
3.4 Failing to Understand the Full Picture	34
3.4.1 Disabled PhD Researchers	34
3.4.2 Ethnicity of PhD Researchers	34
3.4.3 Age of PhD Researchers	36
3.4.4 Other Characteristics	36
3.4.5 No Plans to Improve this Picture	36
3.5 Conclusion	37
3.6 Recommendations	37
4. Involve us on Fair Terms	40
4.1 Recommendations	42
5. Conclusion	43

Executive Summary

Pandemic PGRs is a collective of PhD researchers who came together in April 2020 in response to a lack of support for postgraduate researchers (PGRs) in light of the global COVID-19 pandemic. Since the first UK lockdown, we have campaigned to get better support for PGRs from government, funders and universities both during this pandemic and in its aftermath.

UK Research and Innovation (UKRI) is the largest single funder of doctoral training in the UK, funding around a quarter of all PhD candidates. In light of this, it claims, it has a 'keen interest in the sustainability of the academic and other sectors with which [it] collaborates and the wellbeing of the students who benefit from [its] funding.'¹ However, this interest has failed to translate into sufficient and appropriate support for UK PhD researchers during the ongoing COVID-19 crisis.

1 UKRI (2020), [Review of Extensions for Students Impacted by COVID-19](#). UKRI, UK.

Inadequate Support for Postgraduates Hit by a Crisis

UKRI's [Phase 2 Doctoral Funding Extension Policy](#) is inadequate. First, it disregards the evidence of the plight of PGRs throughout the country, evidence that was gathered during research commissioned by UKRI itself. It disregards the needs PGRs have for funded extensions to be able to continue and complete their projects, and presents qualifying criteria for extensions which are unfair, inflexible, non-inclusive, and unsympathetic to the disruptions this pandemic has caused. PGRs have been told that 'time lost' is an illegitimate reason to seek an extension, which unfairly reframes lack of access to facilities and inability to conduct research projects as an individual choice rather than due to government-mandated requirements in response to a global pandemic.

The report reduces a PhD project to skills, attributes and certification alone, divorcing these from the vast contribution to knowledge PGRs make. Additionally, it does not recognize the detriment to the quantity and quality of research projects wholesale changes to them with no support will cause. Professional development such as teaching and research skills have been entirely suspended in many cases, lockdowns and quarantines removed the ability to develop any sense of community amongst cohorts of PGRs, amplifying the sense of loneliness that is already a concerning feature of PhD research. There are inconsistencies in, and 'cherry picking' of, research data commissioned by UKRI to establish guidelines for the policy response that ignores, or seeks to undermine, the actual on-the-ground experience of PGRs. Ultimately, unless radically changed, UKRI's approach will serve to entrench existing inequalities in academia.

No Real Action on Equality

UKRI's Phase 1 evaluation fails to commit to any concrete actions to address the needs and experiences of researchers with marginalised identities and additional challenges during the pandemic. Neither does it adequately explore the different degrees of impact of the pandemic on marginalised groups, or robustly assess the impact of either phases of its COVID-19 policy on inequality. The [DSA Framework](#) Document from UKRI has not been updated since February 2020, and so does not take into account COVID-19 and the ongoing restrictions to working in any way.

By denying automatic funded extensions of sufficient duration to properly support the post-graduate researchers it funds, UKRI is set to further entrench existing inequality. In short, it is saying that those with parental and other caring responsibilities should not apply, because they will not be given the support they need. Researchers who are not independently

wealthy or do not have reliable access to other forms of income should also not embark on a PhD, because in times of crisis they will not be supported, and enrollment will preclude them from access to state welfare. Black researchers and other researchers of colour, who already struggle disproportionately to access PhD funding will not be protected from the kind of sector wide discrimination and bias identified by the 2019 Leading Routes report, [The Broken Pipeline – Barriers to Black PhD Students Accessing Research Council Funding](#).

Many of these challenges have already been explained to UKRI officials, in letters and meetings over the past eight months. These have been ignored by UKRI. We urge UKRI to fully commit to working in ways that reduce inequalities, rather than reinforcing them.

Ignoring the Voices of Researchers

UKRI's report, and the NatCen report that informs it, describes engagement activity through focus groups and interviews involving a total of 46 researchers. This falls far short of the 7635 signatories - the majority of them students - to three open letters sent in May. As the recent letter from academics stated, consulting just two additional disabled researchers is derisory. The [November 2020 EIA](#) for the Phase 2 policy states that UKRI's stakeholder engagement, explicitly including the meeting with Pandemic PGRs, 'directly informed the development of this policy.' Given the content of the policy and accompanying report, this is clearly not the case. We do not consider this meeting as consultation on this policy, and resent its presentation as such.

PhD researchers have lost trust in UKRI as a result of this process. Non-final year students, in particular, received repeated assertions from ROs and others (these groups were acting in good faith based on assurance from UKRI) that support would be forthcoming if they were patient, and provided the information UKRI requested from them, via their training grant holders. To have this assurance reneged upon after eight months of waiting is disingenuous in the extreme.

PGRs are angry, and justifiably so; this crisis has underlined the sense of isolation many researchers feel, the perception of falling through a gap between 'student' and 'staff' identities, and the lack of support when it is most needed.

Below is a full list of our recommendations for UKRI, for Government and for universities, which also appear below in relevant sections and at the end of this report. These are based on our analysis of UKRI's recent COVID-19 policies and on extensive feedback from PGR students who have been in dialogue with Pandemic PGRs through the development of pre-

viously sent letters and our advocacy on behalf of disabled, chronically ill and neurodivergent researchers.

Recommendations for UKRI (RRI)

- Immediately provide blanket six-month funded extensions for all PGRs, with additional time available for disabled, chronically ill and neurodivergent researchers, those with caring responsibilities and others facing additional hardship, in line with NatCen's own recommendation²
- End requirements for case-by-case applications for COVID-19 support, which create additional barriers for PhD students in terms of additional workload and which, for registered disabled students or those with a past history of medical leave for long-term or chronic conditions, duplicates past certification requirements
- Recognise the detriments of "time lost" to PhD's research projects and professional development, and include this as a justification for an extension, if required
- Allow those who received an extension in Phase 1, including disabled researchers, parents and carers, people who have experienced bereavement and those who have faced additional challenges, to apply again for further support in Phase 2
- Create robust and clear guidelines and support package for all researchers who experience bereavement, especially for immediate family or close relatives, while emergency measures for COVID-19 are in place
- Review the entire UKRI communications strategy, prioritizing fast, effective, and accessible communication directly to PGRs and ROs
- Remove all requirements for sick notes, which, among other problems, disproportionately impact researchers who have used, or need to use, funded sick leave at alternative times. As such, provide additional leave for COVID-19 related health issues, remove sick leave time caps for researchers on Tier 4 visas and send a clear communication to universities that they should not be reporting those on Tier 4 visas for COVID-19 related leaves of absence
- Make specific provision for disabled, chronically ill or neurodivergent PhD students who are also international students and subject to Tier 4 visa rules, with clear national guidance on whether taking medical leave or will result in cancellation of visas, plus guarantees that complaints against failures of disabled access arrangements will not be met with retaliatory reporting to the Home Office by Universities

2 Burridge, H. et al. (2020), [UKRI Covid-19 Student Consultation: Final Report](#), section 2.3. NatCen, UK.

- Make immediate and automatic provision of aids, adaptations and adjustments for those who now have to work from home without existing DSA provision, preferably through the provision of small grants enabling self-purchasing supported by guidelines reflecting existing DSA best practices
- Ensure all material published or commissioned by UKRI reflects UK conventions of the social model of disability by using identity-first language when referring to disabled people and researchers
- Review and plan to improve data collected and published on PhD studentships and awardees, including but not limited to full disaggregation by ethnicity groups by research council, more inclusive gender classifications, data on LGBTQI+ awardees and those with caring responsibilities, and data on completion rates disaggregated by protected characteristics
- Make a meaningful commitment, and develop an action plan, to involve PhD researchers in developing all policy that affects them
- Ensure robust representation of PGRs in all relevant UKRI-funded decision making
- Adopt best practice in stakeholder involvement, including ensuring stakeholders such as PGRs are fully informed about the purpose and realistic likely outcomes of a consultation exercise, that records are produced and shared quickly, that scheduled follow up meetings and/or communications take place, and that meetings are held in a way that is accessible by default as far as possible, and additional needs are asked about and catered for.

Recommendations for Government (RG)

- Provide sufficient funding to UKRI to guarantee funded extensions for postgraduate researchers and for additional mental health provision, bereavement support and other measures
- Guarantee and clearly communicate adjustments to Tier 4 visa requirements, processes, and fees for international PGRs, including but not limited to: a) the cessation of visa cancellations due to an interruption of studies caused by the crisis, b) the extension of visas due to imminently expire for at least as many months as the COVID-19 lockdown, c) the automatic extension of Tier 4 visas to match University-granted extensions (funded and unfunded) without the leveraging of additional visa fees, and d) the assurance that time spent out of the country during and/or due to the crisis does not affect the visa status of any international PGR.

Recommendations for Universities (RU)

- Ensure policies and systems are in place, made public and appropriately monitored to ensure all researchers are, demonstrably, treated fairly, using flexible, generous and inclusive processes that recognise the impact of the pandemic on individual personal circumstances of students, and that the impact will be greater for researchers who already face additional structural barriers to higher education
- Make public governance plans for distribution of funds, award criteria, awards made and comparison to original applications
- Make public the amounts of additional funds and underspends which are available and can be used to support funding extensions
- Ensure match-funded and internally funded researchers are not treated differently from UKRI funded researchers
- Provide robust support for self-funded or unfunded PhD students (including writing up/fourth year students), including but not limited to a suspension of course and continuation fees, rebates of fees paid for the current year, and eradication/relaxation of proof of hardship requirements for hardship funds
- Ensure that visa extensions for researchers on Tier 4 Visas will be accompanied by tuition waivers for un- or partially-funded students
- Publish and implement robust plans for widespread mental health and wellbeing support for PGRs and work with universities to adapt the output expectations, internal deadlines and pastoral and bereavement support within universities
- End the sector-wide presumption that sick leave, medical leave or other suspension of studies is not only non-discriminatory but a best-practice first-line approach to supporting disabled, chronically ill and neurodivergent students, especially for international disabled students for whom leave of absence may jeopardise visa status
- Make a public commitment to maintaining widespread and non-exceptional remote, digital or other distance access to university resources, spaces, events and personnel which enables disabled, chronically ill and neurodivergent students (and staff) to participate in teaching and learning as standard (rather than through retro-fitted reasonable adjustment measures).

Introduction

Pandemic PGRs is a collective of PhD researchers who came together in April 2020 in response to a lack of support for postgraduate researchers (PGRs) in light of the global COVID-19 pandemic. We represent PhD researchers at different stages of our projects, from universities across the UK, funded by UKRI, universities and other funders, as well as self-funded researchers. We include disabled researchers, those with caring responsibilities and those who previously relied on other sources of income to support their studies - income that has disappeared during this crisis. Since the first UK lockdown, we have campaigned to get better support for PGRs from government, funders and universities both during this pandemic and in its aftermath.

UK Research and Innovation (UKRI) is the largest single funder of doctoral training in the UK, funding around a quarter of all PhD candidates. In light of this, it claims, it has a 'keen interest in the sustainability of the academic and other sectors with which [it] collaborates and the wellbeing of the students who benefit from [its] funding.'³ However, this interest

3 UKRI (2020), [Review of Extensions for Students Impacted by COVID-19](#), UKRI, UK.

has failed to translate into sufficient and appropriate support for UK PhD researchers during the ongoing COVID-19 crisis.

A recent article in the [Wall Street Journal](#) noted that American Universities and funders have stepped in to support the current cohorts of PhD candidates, making the ethical decision to invest in the current generation: 'Instead of taking on a new class of aspiring Ph.D.s, scores of programs are extending funding to current students whose studies or job searches were disrupted'. In contrast, throughout the pandemic, we have continued to see slow responses from the UKRI regarding the funding of the current generation of PhD candidates - those who started their programs before 2021. In an initial statement from the UKRI, PGRs, external funders and doctoral training programs (DTPs) and centres (DTCs) were told to wait for the assessment of research into the impact of the pandemic on the entire field, and that some kind of funding extension response would be forthcoming. At the end of April, some support was provided to those in their final year of funding, but in ways that often exacerbated existing problems and barriers experienced by those most in need of that support. While the latest December 2020 update was being compiled, other PGRs were again told to wait and consult with their supervisors about the impact on research and timelines, and what reasonable changes could be made. The announcement made by UKRI, of only restricted and limited support, caused justifiable anger among the PhD community, after waiting in good faith for what had been asked for.

The seven month delay in releasing the latest UKRI report on the funding extension policy has had significant knock on delays for students funded by other means and those self-funding. Research organisations (ROs) have been mostly cut out of the process with money going directly to universities for distribution. Universities themselves have held back on publishing their own material and guidance, including application extension policy frameworks, as they have felt the need to align their policy with UKRI's. Ultimately, this has only been to the detriment of those students who have been left waiting.

In the extensive delays and inadequacies of its latest policy, UKRI has shown a severe lack of compassion for the current cohort of researchers attempting to complete their PhDs. Both the quality of those degrees, the quantity of data collected and the learning experience for researchers is now at risk of falling far below the standard of previous cohorts. Those attempting to complete degrees without the requisite time and funding to support them through the repeated lockdowns - both globally and locally - will be unable to gain the practical skills necessary for employment beyond their time as PhD researchers. The latest reports also insist that PGRs have had a level of access to campuses, libraries, laboratories, mental health and disability services - and the ability to work 'as normal' - to a degree that does not reflect reality.

With the reduction in ability to conduct research projects has also come the reduction in professional development for PGR researchers. Opportunities to develop necessary skills required post-PhD, which include teaching and marking, and laboratory and practical demonstration work, have all but disappeared during the pandemic. Opportunities to exchange and advance knowledge through international research, collaborative projects extending beyond the confines of the UK, presentations and networking at international conferences have ceased or morphed into one-way presentations and meetings to audiences of digital-meeting fatigued peers and colleagues. Moves to online and remote working have not taken place in a way that has taken disabled people's access needs, or the needs of those with caring responsibilities, into account; instead, accessibility has been retrofitted at best, and ignored at worst. This is despite years of asking and campaigning for digital, remote and flexible working by disabled and other academics. Ultimately this creates further structural barriers to higher education and research, particularly for Black academics, disabled academics, women and gender minorities, LGBTQI+ people and other marginalised groups (see Section 3 - Impact on Equality). The data available shows these groups are already underrepresented in the PhD community, and struggle to progress in careers later on; UKRI's policy for PhD support will only exacerbate these inequalities.

UKRI also risks compounding these inequalities with its restricted Phase 2 extension policy. Its own commissioned research shows that the vast majority of PGRs have expressed that they are likely to need extensions. They are now unlikely to receive these. Instead, extensions will be limited to those students who are able to meet Phase 2's burden of proof, presenting themselves as 'worthy' of receiving a funding extension under a limited, inequitable and non-transparent hierarchy of need criteria.

The continuing communication from UKRI throughout the pandemic has been unsatisfactory. UKRI's disregard for the NatCen report and flagrant contradictions of its recommendations downplays and misrepresents the on-the-ground experiences of PGR researchers. In addition, the communication to non-final year PGR researchers by ROs that they would receive the same funded extension provision as final-year students who received up to a maximum of 6-months as per the UKRI policy has only further disadvantaged PGRs who now appear unlikely to receive sufficient support.

Based on UKRI's published report, it has not listened to our repeated representations, both in writing and in meetings with UKRI officials. We believe the needs and views of institutions have been placed far in advance of those of postgraduates trying to begin their careers, and to produce the high-quality, field-relevant research they are passionate about. We believe UKRI's position is in direct opposition to its statements and initiatives around equality, diversity and inclusion (EDI), and, in fact, will work to undo any of the limited pro-

gress that has been made in challenging the structural oppressions of the Academy.

UKRI's continued lack of support is unacceptable. The following report provides a response to its own commissioned and direct reports and policies since the beginning of the pandemic, and especially since the most recent announcement in December 2020. We have felt compelled to write a full report due to the extent of misrepresentations and failings we have identified in this material, and the number of issues that have not been explored.

We have made a number of recommendations to UKRI about how they must improve practice. We accept, however, that UKRI is not the only relevant stakeholder in this process. As such, we have also made recommendations to government and to universities and ROs. In the interests of equality, and the future of the UK's research landscape, these must be taken forward.

Inadequacies in Support

The [Phase 2 Doctoral Funding Extension Policy](#) is inadequate on a number of levels. It disregards the evidence of the plight of PGRs throughout the country, evidence that was gathered during research commissioned by UKRI itself. It disregards the needs PGRs have for funded extensions to be able to continue and complete their projects, and presents qualifying criteria for extensions which are unfair, inflexible, non-inclusive, and unsympathetic to the disruptions this pandemic has caused. There are inconsistencies in, and ‘cherry picking’ of, research data commissioned by UKRI to establish guidelines for the policy response that ignores, or seeks to undermine, the actual on-the-ground experience of PGRs. The lack of strong policy has led to a failure of universities and research organisations to operate according to intention, leaving vague criteria for decision making.

The report reduces a PhD project to skills, attributes and certification alone, divorcing these from the vast contribution to knowledge PGRs make. Additionally, it does not recognize the detriment to the quantity and quality of research projects wholesale changes to them with no support will cause. Professional development such as teaching and research skills have been entirely suspended in many cases, lockdowns and quarantines removed the ability to develop any sense of community amongst cohorts of PGRs, amplifying the sense of loneliness that is already a concerning feature of PhD research. Lastly, PGRs have been told that 'time lost' is an illegitimate reason to seek an extension, which unfairly reframes lack of access to facilities and inability to conduct research projects as an individual choice rather than the cause of government mandated requirements in response to a global pandemic. This section will explore these and other issues in more detail.

2.1 A Last Resort That Falls Well Short

The Phase 2 Doctoral Funding Extension Policy falls profoundly short of the support PhD researchers require. What is more, the report detailing the rationale behind this policy is misleading, and demonstrates a worrying disregard for the evidence on which it is based - including evidence commissioned by UKRI itself. Most importantly, this policy will leave many postgraduate researchers without the security of funded extensions necessary to complete high quality research, in a way that does not cause further detriment to their health and well-being, or serious financial hardship. Ultimately, this will have the biggest effect on the most marginalised researchers, and serve to further entrench inequalities in higher education.

According to UKRI's own estimates, over 18,000 PhD researchers are likely to need extensions - 92% of final year, and 77% of non-final year researchers (Table 1). Three quarters of these students cite lack of access to facilities and resources as the reason for the extension, 35% state health and wellbeing, and 14% state caring responsibilities. However, based on UKRI's policy, only 20% of those researchers who need them will get extensions, and not necessarily of the duration required.

Table 1: UKRI Phase 2 Policy funding estimates of need (UKRI survey data)

	Final year	Non-final year
No. researchers	6,951	15,284
No. needing extensions	6,362 (92%)	11,808 (77%)
Average extension	4.6 months	5.1 months

This is only UKRI-funded researchers, but we expect universities to follow their lead, meaning researchers funded by other means are also likely to be left behind. UKRI has committed to providing £19 million in extra funding to some universities, but this only equates to 6 month extensions for 25 PGRs at each of 100 research organisations - 2,500 researchers in total, out of 28,055 UKRI-funded researchers, or 9% of this population. This sum is far short of the £81 million required based on the stated needs of PGRs. Comparing the stated needs of non-final year students only, as Table 2 shows, demonstrates a significant shortfall both in terms of number of researchers supported, and the sufficiency of that support.

Table 2: UKRI estimates of need versus UKRI offer, non-final year students only

	Need	Offer
No. researchers needing/likely to receive an extension	11,808 (77%)	7,000 (46%)
Length of extension needed/offered	5 months (avg.)	3 months (max.)
Total cost of extensions needed/offered	£75,202,200	£19,000,000

We understand that a number of doctoral training partnerships (DTPs) are also unhappy with this approach, which cuts them out of the process of managing funding entirely. It is also unclear why this decision has been made, which goes against prevailing funding policy, and divides funding for extensions from other potential sources of funding, such as underspend on support grants and other schemes that have been unable to operate during the pandemic.

2.1.1 Limiting Conditions for Support

The UKRI [Terms and Conditions for COVID-19 Phase 2 Doctoral Extension Funding](#) establishes some extremely limiting conditions for funded project extensions, which, again, do not reflect the reality of need. This is by UKRI's own admission. Its report states that final year researchers reported needing an average extension of 4.6 months, while non-final year researchers will need an average of 5.1 months. These numbers will continue to increase with further regional and national lockdowns. However, the terms and conditions specify 'the majority of extension requests should be for up to three months of UKRI support'. This is simply not enough. Furthermore, restricting support to only those who have so far received none denies any researchers who may have underestimated their need in the first instance,

have ongoing caring commitments, or whose circumstances have changed, including as a direct result of COVID-19 and its effects on individuals' long-term health, any opportunity to get the support they sorely need.

In addition, the terms and conditions note that in 'exceptional' circumstances, ROs may award longer extensions, but only if they have the resources to do so, implying that this will need to come from universities' own funds or PhD funding underspend. Early indications from PGRs is that, in fact, universities are presenting three months as an absolute maximum, with no mention of exceptional circumstances. We know from Phase 1 of this policy that universities have not operated in compliance with UKRI guidance on a number of fronts, including requiring separate applications for extensions of time and extensions of funding, as acknowledged in the policy report, and keeping extensions from non-final year students facing exceptional circumstances. This is another example where ROs appear to be failing to follow guidance - at least in part because that guidance is not strong enough.

2.1.2 Lack of Transparency

It is hoped that the requirement of ROs to produce [governance plans](#), covering how funds may be distributed, will go some way to increase accountability. During Phase 1 of the policy many PhD researchers found it impossible to find process plans, assessment criteria or even appeals procedures from their universities, and communication was desperately lacking at many institutions. The governance plan guidance, helpfully, asks universities to provide details on these elements. However, as in Phase 1, elements such as the evidence required from PGRs is left to the discretion of the universities, meaning there is likely to be an uneven bureaucratic burden from university to university. Universities are 'asked', but not required to provide 'enough time' for PGRs to complete applications for extensions; we know they failed to do this at a number of universities during Phase 1. Universities are, again, 'asked' to assure equality of assessment, but there is no mention of how or whether this will be monitored by UKRI, and no mention of race-, gender-, class- or other biases that universities should, but are not asked to, mitigate for.

The implication of the policy is that funded extensions will only be provided to students as a last resort, if it proves otherwise impossible to 'to mitigate the delays and impact of COVID-19', and only if they can demonstrate their needs are greater than those of others. This establishes an inequitable hierarchy of 'need', which will only exacerbate inequalities of who can prove that they, and their research, is 'worthy' of extended funding support. UKRI has said itself that processes will need to be equitable, and has asked universities to provide details of how they will ensure this - but this is not enough. The policy itself unavoidably creates

inequality and a substantial burden of proof, one which will affect those who are most likely to already have to jump through multiple institutional hoops to get the right support during their PhD. The only way to avoid this is to redesign the policy, and to extend automatic funded extensions to PhD researchers of all years, with low or no requirements for information.

2.2 Halting High Quality Research and Successful Careers

A PhD is not simply a certificate. For many, it is an opportunity to significantly contribute to research, and to make a real impact on a researcher's chosen field. It is also, for many, a first step into a career in academia. This is a jobs market widely acknowledged to be highly competitive and increasingly hard to access. UKRI's policy decision, if it stands, will make it harder.

UKRI acknowledges that their instructions will mean 'many students may submit their theses with more limited or partial datasets compared to what was initially expected' but this 'should not be seen to diminish standards in doctoral education' because 'doctoral candidates completing during the pandemic will have the same high-quality skills and attributes expected of all other doctoral graduates' (p.25). This statement is divorced from the reality of building a career in academia on a number of counts. PhD research is valuable research, making original contributions to diverse fields of knowledge, both as individual projects and as members of teams and laboratories. Many PhD researchers will look to publish their research either during or after project completion, and for their research to have an impact in their chosen field. There needs to be consistent, sector-wide (but disciplinary-specific) guidance on examining a PhD where the majority of research (rather than writing up) has been conducted during the pandemic. Reducing a PhD project to skills, attributes and certification alone ignores the loss of this considerable body of work - a loss which is inevitable under current proposals.

2.2.1 Continued Lack of Access to Facilities

The statement and others in the report also vastly overestimate the quantity and quality of access to research sites, labs, archives, national and international field work locations on and off-campus resources including libraries, mental health and disability services. For instance, the UKRI report asserts 'research labs and some workspaces have reopened... [and] many ROs have prioritised the return to work for doctoral students in most need of access to facilities'. It acknowledges that there will be some variation between academic disciplines, but still reports that 'progress made since June has decreased the volume and length of extensions

'required' (according to R0s). This does not reflect the reality for many PhD researchers who, on top of having lost six months or more of 'normal' work time under national and later local lockdowns, and the attendant stress and anxiety these have brought, simply are not able to access spaces in the same way as before. This extends to international collaborations and research projects in archeology, history, anthropology, geography, developmental studies and any other discipline where projects have been entirely halted or cancelled outright.

Many facilities remain extremely limited or completely off-limits, and many researchers, including those who are shielding for their own protection or that of friends or relations, and those who are still having to manage unpredictable childcare arrangements, do not feel safe or able to access them. Despite all of these issues, UKRI has ruled that 'time lost' is not a legitimate reason for an extension. It is a pure fantasy to imagine that researchers have been able to return to their previous levels and methods of practice under these circumstances, or that moves to change projects in order to mitigate the impact of research sites being no longer available, where this is possible, has made extensions less, rather than more, necessary.

2.2.2 Lack of Access to Other Opportunities

While online methods have opened up some opportunities, these have not consistently been presented in accessible and equitable ways. Other activities, including chances to present one's work internationally, the debate and networking that is critical for advancement of knowledge and research that would usually occur at conferences and symposiums, and chances for international collaboration through visiting other universities, have been severely curtailed. There has been a lack of teaching and paid research assistance opportunities across many universities, amounting to significant redundancies for graduate teaching assistants (GTAs) and research assistants, and little continued access to professional development resources. For many, in addition, the pandemic has removed the ability to develop any sense of community among cohorts of PGRs, amplifying the sense of loneliness that is already a concerning feature of PhD research.

2.2.3 Poor Understanding of Mental Illness in the PGR Community

This highlights a further concern regarding the report. It states that 'mental health support services were being increased in response to increases in cases of ill mental health amongst students over the lockdown period'. It follows this by asserting that without this support, researchers 'could remain negatively impacted by the experience with consequences for their health and productivity'. On the first count, it is not true that men-

tal health services were increased across all universities; indeed, some institutions suspended their counselling services during the first lockdown, and others had only a very limited offer for anyone other than undergraduate or younger students. Mental health services outside of ROs were also more difficult to access at this time.

On the second count, equating one's mental ill health with one's productivity is a harmful - and ableist - statement and precedent to set. The report goes on to advise that UKRI should 'review student health and wellbeing on a routine basis to build an understanding of this issue across the doctoral population'. If, as the report implies, UKRI has been unaware of the issue of poor mental health across the doctoral population, despite the crisis among postgraduates being extremely well-documented (see multiple articles in The Guardian⁴⁵⁶ and Nature⁷, as well as preliminary data from the [SENSE](#) study of mental health), then it certainly should not be making harmful statements regarding the mental ill health of the postgraduates that it purports to serve. We, as a population, urgently need better support from bodies including UKRI as this crisis continues to deepen. The abdication of responsibility we see here does not provide the support that is needed to address mental health issues.

One source of support for wellbeing noted by the report is a PGR's supervisory team. However, there is no acknowledgement that this is not a uniform situation for researchers, and thus not a service or safety net that can be relied upon in lieu of formal support. Supervisors often do not have the skills necessary to deal with mental health crises, nor the clinical supervision needed for their own safeguarding; it is inappropriate and impractical to expect them to take on this role. What is more, the report commends an example of a supervisor delivering a care package to a student's home when they were unwell. This is not appropriate. Even assuming good intentions in this one case, in others it could represent a highly concerning lack of boundaries or a troubling dynamic between supervisor and supervisee; the fact that it is promoted in a UKRI report is astonishing.

2.2.4 Disadvantaging the Current Cohort

Finally, when attempting to access the job market after the PhD is complete employers

4 Fazackerley, Anna (2020a). ['Your coursemates are just computer icons': universities call for mental health cash](#). The Guardian, UK.

5 Fazackerley, Anna (2020b). [Tackling drunken students by night, teaching by day: PhD students say they are being exploited](#). The Guardian, UK.

6 Weale, Sally (2019). [Levels of distress and illness among students in UK 'alarmingly high'](#). The Guardian, UK.

7 Editorial (2019). [The mental health of PhD researchers demands urgent attention](#). Nature 575, 257-258.

will be looking for both quality and quantity of experience. Those who completed their PhD before the global pandemic will have a significant advantage in that they had the time, funding and space to improve all of the above skills and attributes that are mentioned, and to complete high quality research, without the interruptions and impacts of national lockdowns and quarantines. The UKRI report acknowledges that 'disruptions and cancellations of student development and networking [...] may in the longer-term disadvantage doctoral students in an increasingly competitive labour market' (p.21). Thus, the UKRI recognises that the quality of PhD training and research will be below standard, yet they will not commit to rectifying these disadvantages. The fact that this is directly advised by UKRI, in order to 'keep research projects on track', flies in the face of many years of guidance and advice that PhD researchers should invest time (and often their own funds) in pursuing additional professional opportunities that will help them take the next step into employment, while also reducing a PhD to a simple certification, rather than the beginning of a career.

This will inevitably harm most those who already face additional barriers to securing, retaining and developing within jobs in academia, including Black academics, disabled academics, women and gender minorities, LGBTQI+ people and others who are excluded by structural barriers. UKRI states in its report that it 'has a keen interest in the sustainability of the academic and other sectors with which we collaborate and the wellbeing of the students who benefit from our funding': its actions, rather, imply an interest in sustaining academia as a space only accessible to some.

2.3 Inconsistencies in UKRI's own Research

As described in its report, UKRI commissioned social research agency [NatCen to conduct a qualitative study](#) 'to understand doctoral students' awareness and experiences of the funded extension policy', including its implementation to date and recommendations for the future. This was presented to UKRI on 25 September 2020, and made public almost two months after, in the days following UKRI's phase 2 policy announcement on 11 November 2020.

There are considerable differences between the NatCen report and UKRI's own [Review of Extensions for Students Impacted by COVID-19](#), published along with the policy announcement, at a cost of [just over £69,000](#). Not least of these is the list of recommendations; NatCen's recommendations have been broadly ignored. In particular, the first recommendation to improve the quality and quantity of support offered, including offering a base level of financial support to all UKRI-funded doctoral students, with additional targeted support for students in specific groups (such as disabled students and students with caring responsibilities), has not been taken up. This has not been com-

mented upon or justified at anypoint. Given NatCen's recommendations come directly from the evidence it gathered, at UKRI's request, it is troubling that UKRI has decided to instead only offer very little support to a very limited number of researchers.

2.3.1 Misrepresenting Researchers' Views

In addition, there are a number of concerning inconsistencies between the commissioned research report and the review of extensions. For instance, the UKRI review gives undue attention to a small number of researchers who stated that they felt their productivity had increased during the earlier stages of the ongoing pandemic. It illustrates this with a quote on p.15 from a researcher who found that their PhD had given them a sense of focus in an otherwise unpredictable situation. This quote, however, was taken from a different section of NatCen's report; the commissioned report used this to illustrate an exception to the otherwise dominant view that the first lockdown had had a detrimental effect on individuals' mental health. The quote used by NatCen to illustrate this sense of increased productivity that UKRI has chosen to focus on is as follows:

During April and May I had to submit an end of year report. So what that meant was analysing the data I had to date, updating my literature review and doing loads of reading during April and May I completely burnt myself out. I was doing 12 hours, 14 hours on and off just trying to get through the work and then I got to the point where I was like, I can't keep doing this because I'm feeling unwell.

(Second year STEM student)

This quote has been replicated in full here to illustrate just how disingenuous it is to imply that PGRs have been able to continue working and have had the support they need, and to downplay the very serious harm that researchers have had to endure as a result of this crisis, and of institutions' refusal to acknowledge and provide for their needs. Even if some have found a sense of focus this does not mean they are not also experiencing poor mental health, or contending with other structural problems. This is not a trivial example, and neither is it an isolated one, even in the NatCen report. We know, based on feedback from researchers across the country, that many have had to deal with extreme hardship, health crises and more, in addition to the trauma and anxiety many have faced as a result of this ongoing pandemic. To have their needs and experiences downplayed or misrepresented by UKRI is insulting in the extreme.

2.3.2 Discrepancies on the Ground

There are a number of other areas where we would dispute UKRI's interpretation or understanding of practice on the ground. A very short section of UKRI's report (p.19) looks at operationalising phase 1 of the policy. It does not, however, detail many of the concerns and challenges faced by PhD researchers. Perhaps most importantly for Phase 2 of the policy, there is no mention anywhere of the challenge, now exacerbated, faced by those non-final year students who had requested extensions, including up to the maximum six months of the phase 1 policy, who were told by their universities to wait until the second phase announcement, and who had been assured that they would receive the same support. This, for many, will now not be the case. Neither does it detail or account for those researchers who had to make two separate applications - one for a funding extension, and one for a time extension - despite assurances that this would not be necessary. Neither does it address the wide range of times allowed for applications, nor waiting times for announcements of results, across different universities. Finally, there is no mention of the kind of reports we have heard from PGRs about institutions where individuals have not been granted the extensions requested, and who were capped at three months even during the more generous first phase policy.

2.3.3 Poor Communication

Pages 10 and 12 of the [Review of Extensions for Students Impacted by COVID-19](#) outline the communications strategy UKRI implemented for the first phase of support. There is no acknowledgement in the report that PhD researchers had to manage a considerable period of uncertainty, with no communication from their funders, and often little communication from DTPs and universities, themselves in the dark about what support they could offer. We heard extensive complaints about lack of communication in the run-up to and after the first announcement, given the seven-month wait non-final year students have had to endure and the limited offer from UKRI, this does not appear to have improved. There is, later in UKRI's report, consideration of late or lacking communication with ROs about this policy, but no similar consideration of the impact for researchers. This is yet another example where UKRI appears to prioritise the views, needs and submitted opinions of universities over PhD researchers. There is also no consideration of the mode of communication; many students found out about UKRI's first offer from social media, which is both inappropriate and inaccessible for those without Twitter accounts. Communication for the second phase did come via email, more appropriately, but this should have been the case from the start.

At least two statements - from Professor Sir Mark Walport of 01 June, no longer available

on UKRI's website but [archived here](#), and from Amanda Solloway MP, [archived here](#) - implied erroneously that all final year researchers would receive six month extensions. NatCen's report acknowledges confusion among researchers, but neither report makes the valid suggestion that communications such as this played their part in that confusion. UKRI messaging around COVID-19 and PhD research did not even mention disability until the open letter to students from Professor Rory Duncan on 24 April, and then it was a non-specific commitment to working with research organisations to ensure 'vulnerable' people are not disadvantaged during the pandemic. An equality impact assessment was also not published until 28th May - a month and a half after the policy announcement. This does not assure us that issues raised by an EIA were mitigated for in the original policy design, or that the EIA is a thorough examination of those issues.

2.3.4 Missing out Key Reasons for Disruption: Bereavement and 'Time Lost'

There is also no provision for, or even a single mention of, the impact of bereavement and the need for additional, dedicated support, including periods of paid leave in UKRI's Phase 1 policy evaluation report. There are only two brief mentions in NatCen's report, and there is no mention in UKRI's Phase 2 policy statement or terms and conditions. Given the ongoing pandemic and its high levels of mortality, the lack of attention given to the issue is surprising. Researchers who experience bereavement as a result of COVID-19, and for any other reason, must be treated with compassion and given the right time and support to deal with both the emotional impact and the practical necessities required.

Finally, as mentioned, 'time lost' has been highlighted as an illegitimate reason for seeking an extension in the UKRI's policy statement and in university funding extension application procedures. This unfairly places the blame of the disruptions caused by the COVID-19 global pandemic onto PGRs as individuals, as though it were somehow PGR's fault that research projects be curtailed, redesigned, or abandoned, when this was the exact advice that UKRI submitted to PGRs and supervisors. Being unable to access labs, libraries, mental health and disability services, research facilities, conduct field research, advance projects, engage in professional development, or care for children or other loved ones are not matters of individual choice by PGRs, but a product of the extraordinary circumstances we find ourselves in.

We did not collectively decide to 'take a break' during the lockdowns and interim periods of disruption, but rather scrambled to reorganise our lives. PGRs have been in and out of lockdown and quarantines like everyone else in the UK, unable to continue working. Unlike much of the population who have been offered furlough and other government fund-

ing schemes due to their inability to work, PGRs have been left with nothing. Worse even, we are being unfairly held responsible for the disruptions caused by an infectious disease. Growing cultures in a lab, participating in longitudinal fieldwork, or engaging the public in collaborative policy creation all takes time, and these are only a few examples of the myriad types of projects where lost time significantly devalues the output. ‘Time lost’ *must* be a legitimate reason to extend blanket funding support for all PGRs. It is the reality for PhD researchers, just as it is for other workers across the country.

2.4 Conclusion

The support which PGRs had been waiting for falls well short of the initial funding given to final year PGRs and the expectations which that set. The phase 2 policy does not adequately address the recommendations from UKRI’s own research nor the collective lobbying of PGRs over the past several months. In point of fact, the UKRI’s own reporting of its commissioned research contains inconsistencies which actively contradict the on-the-ground experience of PGRs during this ongoing crisis, with UKRI’s communication strategies seeming to prioritize the needs of universities and research organisations over PGRs.

The limited support being offered for PGRs requires them to prove the extent of their ‘suffering’, setting up a dangerous precedent in establishing a hierarchy of need. UKRI’s insistence on a case-by-case approach to ‘ensure the responsible investment of public funds’ is inconsistent with the Government’s income support provision for people who have been unable to work during the pandemic. UKRI needs to immediately rectify this by providing blanket funded extensions for all PGRs regardless of year of study.

Those who have no access to additional funded extensions have been told to entirely redesign their PhD research in many cases. There is no acknowledgement of the difficulties or impossibilities of wholesale changing research methods, methodologies, key questions and whole projects with no extra support and no additional time frame to do this in. Some projects can not be changed and some supervisors are unable to secure alternatives. As the quality and quantity of data in research projects is affected, so too are the necessary professional development skills needed for the job market once a PhD is complete. It is inconceivable to suggest that degrees being honoured during this time will be considered as equivalent and worthy as those who did not live through mandatory lockdowns, quarantines, and colossal disruptions to their research projects.

By UKRI’s own estimates 77% of non-final year researchers will need funded extensions. It is only fair and reasonable to then provide that funding and the policy framework to help

support this generation of pandemic PGRs rather than abandoning them.

2.5 Recommendations

Recommendations for UKRI

- Immediately provide blanket six-month funded extensions for all PGRs, with additional time available for disabled, chronically ill and neurodivergent researchers, those with caring responsibilities and others facing additional hardship
- Recognise the detriment of “time lost” to PhD’s research projects and professional development, and include this as a justification for an extension, if required
- Allow those who received an extension in Phase 1, including disabled researchers, parents and carers, people who have experienced bereavement and those who have faced additional challenges, to apply again for further support in Phase 2
- Create robust and clear guidelines and support package for all researchers who experience bereavement, while emergency measures for COVID-19 are in place
- Review the entire UKRI communications strategy, prioritizing fast, effective, and accessible communication directly to PGRs and ROs.

Recommendations for Government

- Provide sufficient funding to UKRI to guarantee funded extensions for postgraduate researchers and for additional mental health provision, bereavement support and other measures

Recommendations for Universities

- Ensure policies and systems are in place, made public and appropriately monitored to ensure all researchers are, demonstrably, treated fairly, using flexible, generous and inclusive processes that recognise the impact of the pandemic on individual personal circumstances of students, and that the impact will be greater for researchers who already face additional structural barriers to higher education
- Make UKRI policy governance plans public, including details of distribution of funds, award criteria, awards made and comparison to original applications
- Make public the amounts of additional funds and underspends which are available and can be used to support funding extensions
- Ensure match-funded and internally funded researchers are not treated differently from

UKRI funded researchers

- Provide robust support for self-funded or unfunded PhD students (including writing up/fourth year students), including but not limited to a suspension of course and continuation fees, rebates of fees paid for the current year, and eradication/relaxation of proof of hardship requirements for hardship funds
- Publish and implement robust plans for widespread mental health and wellbeing support for PGRs and work with universities to adapt the output expectations, internal deadlines and pastoral and bereavement support within universities UKRI's Phase 1 evaluation does make some reference to the different needs of different groups of PhD students. It does not, however, commit to any concrete actions to address those needs during the pandemic. Neither does it adequately explore the different degrees of impact of the pandemic on marginalised groups, or robustly assess the impact of either phases of its COVID-19 policy on inequality.

3

Impact on Equality

UKRI's Phase 1 evaluation does make some reference to the different needs of different groups of PhD students. It does not, however, commit to any concrete actions to address those needs during the pandemic. Neither does it adequately explore the different degrees of impact of the pandemic on marginalised groups, or robustly assess the impact of either phases of its COVID-19 policy on inequality.

By denying automatic funded extensions of sufficient duration to properly support the post-graduate researchers it funds, UKRI is set to further entrench this inequality. In short, it is saying that those with parental and other caring responsibilities should not apply, because they will not be given the support they need. Researchers who are not independently wealthy or do not have reliable access to other forms of income should also not embark on a PhD, because in times of crisis they will not be supported, and enrollment will preclude them from access to state welfare. Black researchers and other researchers of colour, who already struggle disproportionately to access PhD funding will not be protected from the kind of sector wide discrimination and bias identified by the 2019 Leading Routes report, [The Broken Pipeline – Barriers to Black PhD Students Accessing Research Council Funding](#).

This section outlines some of the contradictions, inaccuracies and questions raised by UKRI's most recent publications. It is not a complete record of the challenges faced by marginalised PhD researchers; UKRI needs to fund research into this, to talk to those already researching it, and to pay the marginalised researchers who are trying to make the system better, if they want to fully understand those challenges.

Many of these challenges have already been explained to UKRI officials, in letters and meetings over the past eight months. We feel strongly that these have been ignored. We urge UKRI to fully commit to working in ways that reduce inequalities, rather than reinforcing them.

3.1 An Inadequate EIA

The most recent equality impact assessment (EIA) is disappointing in the extent to which it fails to address the issues it - rightly - identifies. The table below (Table 3), for instance, lists an inexhaustive range of possible issues faced by some researchers; the subsequent 'mitigations' column does not, in fact, mitigate these. It also falls short on a number of specific fronts. For instance, the document fails to identify the risk to transgender researchers who may find it more difficult to access services and medications, and thus may have greater need for an extension, but unable to secure one in light of UKRI's restricted support. It identifies a risk to younger researchers' careers as a result of longer completion times, but not as a result of UKRI guidance to sacrifice career development opportunities; the suggested mitigation guidance is that 'the extension is not mandatory', which is an extreme simplification of the issue. DSA is referenced as a solution to some extra costs for disabled researchers but, as detailed below, DSA is not fit for purpose, and is furthermore not available to international researchers on Tier 4 visas. This is another issue that is not addressed; indeed, no issues regarding UK residency status are addressed, despite

UKRI funds rightly being available to researchers without settled status. There is no mitigation suggested for researchers who are not independently wealthy or have sufficient alternative income to support them in lieu of a funded extension - only an acknowledgement that this will be an issue that 'may lead to disadvantage'. What would clearly mitigate disadvantage would be to extend non-competitive, unrestricted funded extensions to all researchers, of up to six months apart from where there is clear additional need, and to trust PGRs to make appropriate use of these according to how much they require.

Table 3: Summary of issues that may lead to disadvantage - UKRI EIA Report 11/2020

Issues	Mitigation
<p>Students are having to adjust and re-plan their work to reflect the impact of working through the pandemic. The stage the student is at in their studies and their personal circumstances may mean the level of adjustment they are able to make is constrained and they are still unable to complete within their funded period</p>	<p>The policy focuses our support on those students for whom our Review has found will find it most difficult to adjust their projects and complete within their current funding period. This includes, not exhaustively, students in their final year of studies, disabled students, those with a long-term illness and neurodivergent students, or those who have caring responsibilities.</p>
<p>Disabled students, those with long-term illness and neurodivergent students or those with caring responsibilities may be less able to change their working hours to access facilities.</p>	<p>UKRI has set clear expectations for how ROs should deliver the additional funding in the Term and Conditions. ROs are asked to confirm they will follow the UKRI process in their Governance Plan and set out how their process will ensure open and equal access for all students.</p>
<p>Vulnerable and very vulnerable groups may be advised not to work outside the home or are otherwise more cautious about engaging with research work in shared environments</p>	<p>ROs are encouraged to provide students with contact details of alternative professional staff in case students do not wish to disclose sensitive personal issues to training grant holders and/or supervisors.</p>
<p>Some students or their families may be ill with COVID-19</p> <p>Some students may be marginalised or less connected with their research groups and research communities. For example, Autistic students and those with high anxiety may struggle to form new communities (or reform them in a new format) and the move to online may have exacerbated this.</p>	<p>Web guidance issued 11 November provides guidance on supporting students who have had periods of long-term absence.</p>
<p>Greater impact on lower income families; family members more likely to be at risk of COVID-19 working in public facing roles.</p>	<p>Web guidance issued 11 November.: Additional costs include costs for home working.</p>
<p>Loss of income from other family members, leading to the need to find higher paid work.</p>	<p>UKRI will continue to encourage grant holders to seek contributions from students' co-funders for extensions.</p>
<p>Potential loss of co-funding from some partner organisations.</p>	

3.2 No Real Action for Disabled, Chronically Ill and Neurodiverse PGRs

Disabled students are a segment of the academic community whose participation is, as a matter of course, predicated on disparate, inordinate and derailing administrative activities that are not required of their nondisabled peers. A report by the Office for Students (OfS) indicates that disabled students make up a little over 13% of the English student population overall, falling short of the UK disabled population rate of 22%⁸. The percentage of UKRI awards made to disabled researchers is even lower, at 7%. The OfS states that it is ‘concerned about persistent gaps in access, success and progression for disabled students.’ This statistic is just one indication of structural pressures and stigma working to limit disabled people’s access to PhD-level study.

UKRI’s own practice exacerbates these pressures. The case-by-case approach that it insists is good practice brings with it the clear risk that institutions will make different decisions for PhD students in equivalent circumstances, giving rise to inequalities and potentially discrimination based on institution, funding consortium, or disability/illness. Indeed, we have seen this in practice, as we have explained to UKRI on previous occasions. This may be compounded by additional challenges and discriminatory practice faced by those with multiple marginalised identities, including students of colour, trans students, international students, students with no recourse to public funds and working class students, among others.

3.2.1 Ongoing Problems with Sick Leave and Leaves of Absence

UKRI has provided some - but limited - guidance to researchers and institutions regarding sick leave in light of the pandemic. There is reference to sick leave in the [students and training grants guidance](#) updated 11th November 2020, which does address some issues researchers will face, or have done so already, such as considering sick leave during the pandemic as separate from the 13-week maximum. However, it does not address the wider issues of long-term absence, both in terms of how policies are operating on the ground, and the unforeseeable, but resolvable, problems raised by the COVID-19 pandemic. For instance, some researchers who have previously taken periods of sick leave or leaves of absence have, by doing so, pushed their funded period end date beyond the phase one cut-off point, and thus were excluded from that round of support. Now, they are ineligible or only able to access a maximum of three months’ extension, despite likely facing considerable extra challenges in completing their doctoral research. This seems like a clear case of punishing researchers for being disabled, in contravention of the Equality Act.

⁸ Office for Students (2019). [Beyond the bare minimum: are universities and colleges doing enough for disabled students?](#) Office for Students, UK.

The phrasing of the guidance also creates some ambiguity around its application to existing disabilities and health conditions. As a result, it has created a two-tier system in some universities, where researchers who have contracted COVID-19 or can prove exacerbation of a condition as a direct result of the virus are able to follow one set of slightly favourable policies, while others with pre-existing conditions or who aren't able to provide sufficient proof must follow the old system. This means they are still required to provide often difficult-to-obtain medical evidence, and still have their sick leave included in the 13-week maximum. Not only is this confusing and burdensome for researchers and administrators, but it is unrealistic; disabled researchers must be given the benefit of any doubt, given the high likelihood that exacerbated, new or changed conditions are related to the period of global pandemic. An approach that demands they provide sufficient proof that this is the case negates any benefit of a less bureaucratic system. It is simply nonsense to operate in this way. By creating this ambiguity, rather than simply providing a blanket relaxation or reform of the policy, UKRI has allowed universities to function in this nonsense fashion.

Beyond the operation of the extensions policy, we know that sick leave policies are also not being enacted as UKRI seems to have intended; anecdotally, researchers report that they are discouraged from taking necessary sick leave in a number of ways, even after the positive and necessary changes to the policy made by UKRI in 2019. It should be noted that researchers on Tier 4 visas are unable to take paid sick leave, and so lack even the basic security and support if they do become sick from COVID-19 or any other condition. In addition, we know that some higher education institutions have recommended an unpaid leave of absence for disrupted disabled or chronically ill students rather than providing adequate support, extensions, or funding. Given that many disabled and chronically ill PhD students are looking for support to continue their studies during a time of heightened disadvantage, and not otherwise because of illness, it is inappropriate to provide a leave of absence as a solution, which often removes disabled students from institutional support structures, library access, and financial supports such as hardship funds. Likewise, sick leave should not be presumed a first response to the challenges faced by disabled researchers; these challenges may well be due to institutional barriers, which the institution needs to remove, and not related to ill health. It is ableist and discriminatory to ask researchers to absent themselves from the academy for periods when the academy is unwilling to provide adequate support.

3.2.2 Problems with Phase 1: Disabled Researchers Missing Out

While UKRI documents say that Phase 1 extensions were available to disabled researchers and those with caring responsibilities in exceptional circumstances, and that longer extensions are also available to those with high levels of need now, we know that this is

not how the policy has operated on the ground. Instead, these researchers were first told, by university staff acting in good faith, to ‘wait and see’, and are now being told that three months is the upper limit, if they are eligible at all. It is disappointing that UKRI’s Phase 1 evaluation did not cover how policies were enacted at universities across the country, and that these experiences have not been taken into account in the Phase 2 design.

The policy also does not adequately address issues of diagnosis and disclosure. While this section of the report generally refers to known disabled, chronically ill and neurodivergent PhD students, we acknowledge, in line with university policies around ensuring student mental health and wellbeing, that not all those who experience physical or mental health challenges will be at the stage of having received a diagnosis, and that without clinical confirmation, most universities will not recognise such students as disabled or chronically ill. This is despite the fact that the Equality Act does not require a medical diagnosis or medical evidence. It should also be acknowledged that during this time of crisis students may recognise symptoms for the first time, want to seek out formal diagnosis, and may be unable to do so. Others may not wish to disclose disability or health conditions for a variety of reasons, many of which relate to the structural ableism of universities and other institutions. It is noted that UKRI has said that universities should relax their policies on requiring medical evidence, but - again - this is not being enacted on the ground. Researchers are still being required to provide medical evidence to ‘prove’ their disability, or are having to argue that they are ‘disabled enough’ to be considered for support under the Phase 2 policy. This second phase in fact exacerbates the problem, by limiting support on offer considerably. At least one university we know of has operationalised UKRI’s policy as a priority list; first providing support for previously-penultimate year students, and then looking at the needs of its remaining disabled researchers, providing they can provide sufficient evidence of the impact of their disability. This is a frustrating and inequitable approach, and one enabled by UKRI’s guidelines.

Guidance to institutions and suggestions in the EIA state that disabled and other researchers should be provided with an alternative point of contact to whom they are able to disclose any sensitive issues if they do not feel able to tell their supervisor; this assumes that alternative professionals are available, understand the PhD process (rather than focusing on undergraduate or postgraduate taught studies), and are able to feed into extension decision-makers without applications being otherwise prejudiced or gatekept by supervisors, unaware of or ill-equipped to deal with the issues the researcher faces. We are being told to rely on good supervision, and on an assumption that all professionals involved in this process will be fully versed in disabled peoples’ rights and needs, or somehow free from bias that will affect their decisions. This is fundamentally unrealistic. Again, what is needed is guaranteed support.

3.2.3 No Consideration of Intersecting Identities

We know that there are significant disparities in access to health care and diagnosis among multiply marginalised communities⁹, including Black students and students of colour¹⁰, LG-BTQI+ students¹¹, and international students¹². It is vital to provide support that takes intersecting needs into account¹³. Many of these researchers will also have to face the kind of bias mentioned above, inherent in academic (and other) institutions, when making their cases for extensions. Given UKRI's limited data collection and minimal commitment to transparently monitoring these processes, we are not confident that these researchers will see these additional challenges mitigated, on top of those already faced.

3.2.4 Disabled Students Allowance: Not Fit For Purpose

UKRI refers to the support DSA can offer to disabled, chronically ill and neurodivergent researchers throughout its policy and guidance. However, it does not sufficiently explore whether DSA actually provides adequate support to these PGRs. Recommendations in UKRI's Phase 1 policy evaluation include encouraging data-sharing between university departments, and reviewing DSA scheme guidelines 'to ensure that these recognise the impact of the pandemic'. This surely should have been a concrete action taken at the very beginning of the UK's first period of lockdown, rather than a suggestion made eight months later, without any commitment, plan or timeline to follow through.

We have heard anecdotal evidence from a number of disabled postgraduate researchers who often have had to fight to get the right support, equipment and adaptations through DSA, even without the extra pressures the pandemic has brought. Some of the acknowledged problems with DSA are documented by disabled PhD researcher Stephanie Hannam-Swain, including lengthy and stressful application processes that do not take into account fluctuating conditions or changing needs, and which exclude a number of

9 Marmot et al. (2010). '[Fair Society Health Lives \(the Marmot Review\)](#)'

10 Race Equality Foundation and MHPF (2015). '[Better Practice in Mental Health for Black and Minority Ethnic Communities](#)'

11 Women and Equalities Committee (2019). 'Health and Social Care and LGBT Communities'

12 Hunley, Holly A. (2010). 'Students' Functioning While Studying Abroad: The Impact of Psychological Distress and Loneliness.' *International Journal of Intercultural Relations* 34 (4): 386–92

13 Morris, Siobhan et al (2019). 'Structurally Unsound'.

much-needed forms of support¹⁴. During the pandemic, when some disabled researchers have had to move to new physical working environments, there has been little extra support to adapt. Researchers have had to make new applications to DSA to get what they can, which has been time consuming and burdensome. Some researchers have been denied equipment or other support that they have needed as a result of the pandemic because they do not have long enough - more than one year - left on their registration to qualify for a fresh reassessment for DSA, even if they are already in receipt of an award. Others have had to wait for long periods for applications to be approved, or have been told to make purchases in advance and make a later claim, regardless of whether they can afford this.

These and other problems with DSA in fact pre-date the pandemic, but have been exacerbated by it. Little attention has been paid to its effectiveness or operation on the ground. It is disappointing, but given the lack of prior attention, unsurprising, that a professional body was consulted regarding DSA for the purposes of UKRI's policy review, but disabled PGRs themselves were not. The [DSA Framework Document](#) from UKRI has not been updated since February 2020, and so does not take into account COVID-19 and the ongoing restrictions to working in any way. Finally, DSA is also not available to researchers on Tier 4 visa; this cohort has little access to support, aids and adaptations necessary to complete their PhDs.

It is not appropriate for UKRI to continuously refer to DSA as providing adequate support to disabled researchers, both during this crisis and before, when the evidence suggests the contrary. Its existence alone is not enough; UKRI needs to commit to and produce a plan for reviewing and reforming DSA, both for the pandemic and in its aftermath, as a matter of urgency.

3.3 Little Support for Parents and Carers

As stated in the [recent letter](#) to UKRI and relevant government ministers, parents and carers are being given very little support to continue their PhDs alongside ongoing caring responsibilities. There is little recognition from UKRI of the impact of repeated school closures, isolation needs where school and nursery 'bubbles' are breached, or reduced support for adults with health and care needs from professional services, increasing the level of care delivered by family and friends.

Many parents and carers have been home-educated children full-time for many months already and face ongoing severe disruption to our working week, which no amount of meth-

14 Hannam-Swaine, Stephanie (2018). '[The Additional Labour of a Disabled PhD Student](#)'. *Disability and Society* 33 (1): 138 - 142

odological innovation could possibly mitigate. Instead they are being expected to somehow reach the same academic standards in vastly less time than their peers. Some have lost additional sources of income themselves or within their family, adding extra financial pressures to an already extremely difficult time. UKRI shows no sign of having taken any of this into account.

The fact that UKRI refuses to recognise ‘time lost’ as a legitimate reason for granting funded extensions is particularly harmful to this group. It is entirely divorced from the lived reality of these parents and carers during the ongoing pandemic. For many, it has been simply impossible to maintain a ‘normal’ work pattern for their PhD, given changed or increased responsibilities. UKRI must act to recognise and provide for these challenges; otherwise, it gives the message that parents and those with caring responsibilities have no right to pursue a PhD.

3.4 Failing to Understand the Full Picture

UKRI’s review of the Phase 1 policy says in its introduction that its PhD cohort is ‘very diverse’. It offers no evidence to support this. What the publicly available data, via UKRI’s [Equality, Diversity and Inclusion \(EDI\) funding data dashboard](#), does tell us, contrary to UKRI’s assertion, is that the PhD community, or at least the high percentage of it funded by UKRI, is not as diverse as it needs to be. This data is also extremely limited, however, so it is impossible to understand the full picture of the PhD community.

3.4.1 Disabled PhD Researchers

What we can tell is that just 7% of UKRI studentships across all research councils were awarded to disabled researchers in 2018/19. The Economic and Social Research Council (ESRC) has the highest percentage of disabled PGRs, at 11%, while both the Science and Technology Facilities Council (STFC) and the Medical Research Council (MRC) made just 5% of their awards to disabled researchers - 15 and 20 individuals respectively. As stated, this is compared to the UK disabled population rate of 22%, and a disabled student population rate of 13%, falling well short of both. Clearly, there is a disability gap in doctoral studentship awards, although given possible low disclosure rates and later diagnoses, more work needs to be done to ascertain the nature and extent of this gap.

3.4.2 Ethnicity of PhD Researchers

The data available from the EDI funding data dashboard only disaggregates studentships by a limited set of ethnicity markers: white, ethnic minority, not disclosed and unknown. This is poor practice, and means we can tell very little about the ethnicity of PGRs. However, we can see that 9% of all UKRI awards were made to researchers classed as from an ethnic minority in 2018/19 - 565 individuals. The Arts and Humanities Research Council (AHRC) and the Natural Environment Research Council (NERC) had the lowest percentage at 6% of total awards, or 60 and 30 awardees respectively, while EPSRC made 11% of its awards - 315 - to 'ethnic minority' researchers in 2018/19. However, [data published in December 2020](#) does

Table 4: Number of UKRI studentship awards by ethnicity category, 2018/19

Ethnicity Category	No. of awards	Proportion of applications
Asian & Asian British - Bangladeshi	10	0%
Asian & Asian British - Chinese	90	1%
Asian & Asian British - Indian	90	1%
Asian & Asian British - Other	65	1%
Asian & Asian British - Pakistani	45	1%
Black & Black British - African	55	1%
Black & Black British - Caribbean	10	0%
Black & Black British - Other	10	0%
Mixed - Other	100	2%
Mixed - White & Asian	60	1%
Mixed - White & Black African	10	0%
Mixed - White & Black Caribbean	10	0%
Not Disclosed	1425	22%
Unknown	435	7%
White - British	2820	44%
White - Irish	65	1%
White - Other	1040	16%

disaggregate by ethnicity groups further, although is only available for UKRI overall, rather than for separate research councils. This data shows that just 95 single awardees were Black or mixed race white and Black African or Caribbean in 2018/19. Black Caribbean and Black other, along with Bangladeshi, had just ten awardees in each group. All ethnic minority groups had low numbers of awardees.

3.4.3 Age of PhD Researchers

Only 100 studentships, out of 6,355, were given to people aged over 50 in 2018/19; while PhDs may be more commonly pursued by those at the beginning of their careers, and thus in younger age groups, this small sub-cohort has clear contributions to make, and face challenges different to their younger colleagues, that must not be forgotten.

3.4.4 Other Characteristics

There is no data available from this source on the number of UKRI-funded PGRs with caring responsibilities of different kinds, LGBTQI+ PGRs, PGRs who identify as a gender other than male or female, or PGRs on study visas. None of this data tells us about PhD completion rates or time to complete for different groups, or about intersecting identities of awardees. Of course, given the nature of the data, it also does not tell us about the experience of marginalised researchers during their PhD; this is something UKRI could usefully fund research into.

3.4.5 No Plans to Improve this Picture

To say, based on this data, that the UKRI-funded PhD cohort is ‘very diverse’ is disingenuous. It is also concerning that, beyond some acknowledgement of the additional challenges faced by disabled, chronically ill and neurodiverse researchers, no effort has been made to address this issue, or to robustly assess the impact - both short term and long term - of UKRI’s policy on these marginalised groups. It is especially concerning that, on page 11 of its report, UKRI explicitly rules out regular and targeted monitoring of its policy, instead ‘embed[ing] monitoring as part of our business-as-usual training grant monitoring’. The November 2020 EIA expands upon this, stating ‘the impact of the policy will be reviewed as part of the UKRI evaluation of COVID-19 Research stabilisation interventions which is a joint UKRI/BEIS evaluation.’ While there is no further detail, no published plans and no timeline for this work, this implies that there will be no further specific published reports on the imple-

mentation of the policy, including fully understanding its impact on groups with protected characteristics.

It also suggests there will be no review and no further revisions of policy as this global pandemic continues into 2021 - particularly pertinent as infection rates reach a new peak in the UK and we enter a third lockdown period. Finally, there is no mention of the seemingly clear need to improve the data collected and made public on the demographics of PhD award holders. As stated, the data currently published for PhD awards does not provide sufficient information to fully understand the experience of marginalised researchers during their projects; this is a further missed opportunity to make a real, tangible commitment to understanding and addressing the additional barriers faced by these groups.

3.5 Conclusion

This section has highlighted ways in which UKRI's most recent policy and accompanying documentation has failed to meet the challenge of ensuring a truly diverse, well-supported PhD community. Many of the problems raised are not new, and many have been raised with universities, funders and government repeatedly over many years, with little to no action. Marginalised researchers have had to put significant effort, over and above that of their white, financially secure, cis-male, non-disabled peers, in order to even begin their PhD studies. Structural racism, ableism, classism and other forms of oppression make continuation and completion a continuing battle. UKRI's most recent policy, and its abdication of responsibility for supporting researchers during this global crisis, only makes that battle harder.

Finally, regarding disability, it should be noted that even in most recent communications, such as in NatCen's report, language has switched between person-first and identity-first references (people with disabilities versus disabled people); we request that UKRI and its partners, including those producing commissioned work, always use 'social model' identity-first language.

3.6 Recommendations

Recommendations for UKRI

- End requirements for case-by-case applications for COVID-19 support, which create additional barriers for PhD students in terms of additional workload and which, for registered disabled students or those with a past history of medical leave for long-term or

chronic conditions, duplicates past certification requirements

- Remove all requirements for sick notes, which, among other problems, disproportionately impact researchers who have used, or need to use, funded sick leave at alternative times. As such, provide additional leave for COVID-19 related health issues, remove sick leave time caps for researchers on Tier 4 visas and send a clear communication to universities that they should not be reporting those on Tier 4 visas for COVID-19 related leaves of absence
- Make specific provision for disabled, chronically ill or neurodivergent PhD students who are also international students and subject to Tier 4 visa rules, with clear national guidance on whether taking medical leave will result in cancellation of visas, plus guarantees that complaints against failures of disabled access arrangements will not be met with retaliatory reporting to the Home Office by Universities
- Make immediate and automatic provision of aids, adaptations and adjustments for those who now have to work from home without existing DSA provision, preferably through the provision of small grants enabling self-purchasing supported by guidelines reflecting existing DSA best practices
- Review and plan to improve data collected and published on PhD studentships and awardees, including but not limited to full disaggregation by ethnicity groups by research council, more inclusive gender classifications, data on LGBTQI+ awardees and those with caring responsibilities, and data on completion rates disaggregated by protected characteristics
- Ensure all material published or commissioned by UKRI reflects UK conventions of the social model of disability by using identity-first language when referring to disabled people and researchers.

Recommendations for Government

- Guarantee and clearly communicate adjustments to Tier 4 visa requirements, processes, and fees for international PGRs, including but not limited to: a) the cessation of visa cancellations due to an interruption of studies caused by the crisis, b) the extension of visas due to imminently expire for at least as many months as the COVID-19 lockdown, c) the automatic extension of Tier 4 visas to match University-granted extensions (funded and unfunded) without the leveraging of additional visa fees, and d) the assurance that time spent out of the country during and/or due to the crisis does not affect the visa status of any international PGR.

Recommendations for Universities

- End the sector-wide presumption that sick leave, medical leave or other suspension of studies is not only non-discriminatory but a best-practice first-line approach to supporting disabled, chronically ill and neurodivergent students, especially for international disabled students for whom leave of absence may jeopardise visa status
- Ensure that visa extensions for researchers on Tier 4 Visas will be accompanied by tuition waivers for un- or partially-funded students
- Make a public commitment to maintaining widespread and non-exceptional remote, digital or other distance access to university resources, spaces, events and personnel which enables disabled, chronically ill and neurodivergent students (and staff) to participate in teaching and learning as standard (rather than through retro-fitted reasonable adjustment measures).

4

Involve us on Fair Terms

We are disappointed that, despite assurances, UKRI does not appear to have any intention on following through on its commitment to coproducing policy with postgraduate researchers.

The UKRI review report notes that consultation for Phase 1 was necessarily limited due to time constraints, and that more consultation would have aided the implementation of the policy had there been more time. The review shows little evidence of having learned from this lesson, however. UKRI's report, and the NatCen

report that informs it, describes engagement activity through focus groups and interviews involving a total of 46 researchers. This falls far short of the 7635 signatories - the majority of them students - to three open letters sent in May. As the recent letter from academics stated, consulting just two additional disabled researchers is derisory.

Furthermore, we note that UKRI's December 2020 response to the open letter from academics mentions students who declined to meet with UKRI to provide feedback on future policy¹⁵. We find this very concerning as UKRI's response suggests that those students relinquished their right to be listened to. The researchers in question declined to meet with UKRI as UKRI could not provide an assurance that the single meeting would not be regarded as an action taken by UKRI, or be represented as consultation of any future policy decisions. This was clearly explained at the meeting between UKRI and representatives of PandemicPGRs. The fact that both of these concerns (presumed action taken and consultation) have been realised through this latest report demonstrates clearly the validity of the researcher's position, those who declined to meet with UKRI. The [November 2020 EIA](#) for the Phase 2 policy states that UKRI's stakeholder engagement, explicitly including the meeting with Pandemic PGRs, 'directly informed the development of this policy.' Given the content of the policy and accompanying report, this is clearly not the case. We do not consider this meeting as consultation on this policy, and resent its presentation as such.

UKRI has said repeatedly, in its report and in communications via email and social media, that it has 'spoken to many in our community', and that their views have informed this most recent policy. In the case of PhD researchers, it is difficult to see how this can be the case. We have heard from researchers who filled in questionnaires from their training grant holders, having been told that the purpose was to indicate the support they would need, in the expectation of receiving it. In fact, they will now receive none.

It is evident from the most recent policy report that none of the concerns raised through multiple letters and the meeting of September 2020 have been used in earnest to inform the approach, aside from occasional references to dissenting opinion, which have largely been downplayed in favour of those more closely aligned with UKRI's own. Where dissenting opinions are included, the issues and questions they raise are not addressed or answered; for example, page 14 of UKRI's report acknowledges the uncertainty and anger felt by many non-final year researchers, that penultimate-year researchers are most likely to face significant disruption, and that interviewees urged UKRI to extend its support to this group. However, these issues are not addressed, many of these students remain inadequately supported, and no justification for failing to provide for their needs is supplied. Furthermore, the

15 Duncan, Rory (2020). Response to open letter regarding funding for UKRI students. UKRI: UK.

testimony of disabled, chronically ill and neurodivergent researchers, both in writing and in person, has simply been ignored, as detailed above.

Much of the focus on partnership working in the UKRI report is on working with organisations - not with those people directly affected by the policy. The partnership section on page 22, for instance, relates to working in closer partnership with R0s, and there are references elsewhere to sector partners such as the UK Council for Graduate Education. There is no corresponding commitment or plan to work in closer partnership with PhD researchers themselves. Perhaps if UKRI had focused more on the views and experiences of these researchers, rather than R0s, its report might better reflect the reality of struggling to work during this global pandemic.

PhD researchers have lost trust in UKRI as a result of this process. Non-final year students, in particular, received repeated assertions from R0s and others that support would be forthcoming if they were patient, and provided the information UKRI requested from them, via their training grant holders. To have this assurance reneged upon after eight months of waiting disingenuous in the extreme.

4.1 Recommendations

Recommendations for UKRI

- Make a meaningful commitment, and develop an action plan, to involve PhD researchers in developing all policy that affects them
- Ensure robust representation of PGRs in all relevant UKRI-funded decision making
- Adopt best practice in stakeholder involvement, including ensuring stakeholders such as PGRs are fully informed about the purpose and realistic likely outcomes of a consultation exercise, that records are produced and shared quickly, that scheduled follow up meetings and/or communications take place, and that meetings are held in a way that is accessible by default as far as possible, and additional needs are asked about and catered for.

5

Conclusion

PhD researchers have been let down by their funders and institutions. Many of the problems raised during the COVID-19 pandemic are not new ones, particularly in terms of the challenges faced by marginalised researchers, and the difficulty of reforming the systems that create those challenges. PGRs are angry, and justifiably so; this crisis has underlined the sense of isolation many researchers feel, the perception of falling through a gap between 'student' and 'staff' identities, and the lack of support when it is most needed.

We have, so far, been ignored. We have raised these problems consistently, but with little to no effect. This situation will lead not only to a loss of quality research and talented researchers, but will further entrench inequality in the Academy. The message that UKRI and other institutions are sending is that postgraduate research, and academia as a whole, only exists for those who are independently wealthy, non-disabled, white, cis-male, and without children or loved ones who need care and support.

This is not the Academy we want. But without an urgent change in approach, it is the one we will continue to find if we are able to progress in our careers. We hope that decision-makers, funders and universities will finally listen, and work with us to secure the right support for postgraduate researchers.

