

SCHOOL OF ECONOMICS AND MANAGEMENT

Bachelor Programme in Economy and Society

A level playing field? A comparative analysis of financial student aid in Sweden and Germany

by

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Abstract: This qualitative case study compares two different student aid systems, the universal Swedish one (CSN) with the needs-based German one (Bafög) to determine their effect to facilitate enrollment in university education and reduce socioeconomic inequalities. For this, tertiary students in Germany and Sweden were surveyed for their opinion on the equality of their respective student aid systems. John Rawl's theory of distributive justice is used as a baseline for equality. It is shown that while the Swedish system promotes equality due to its good accessibility and financial reliability, the German system does not as financial support was shown to vary across students while student aid was difficult to access and maintain. Therefore, it is recommended for the German system to be reformed towards a more universal student aid system to make educational access fairer and to reduce socioeconomic inequalities.

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1. Introduction

While higher education in Europe comes at no to little cost to the students due to its financing via taxation, the decision to pursue a tertiary degree presents a substantial opportunity cost—a financial burden that many students from especially economically weaker families cannot afford easily. To prevent income inequalities from rising, it is crucial to level the playing field, for instance, by ensuring equal access to education. For this reason, the current welfare state systems in Sweden and Germany both provide their own form of financial aid to support students.

These systems, however, differ strongly: while Sweden offers de-facto universal accessibility to almost all Swedish university students, Germany limits accessibility to students from economically weaker families, with parents funding their children if possible (European Commission, EACEA & Eurydice, 2020). For Germany, it can be argued that it is already economically disadvantaged students who later on end up with student debt compared to the parentally funded students. In addition, it is often argued that the bureaucracy of the system is frequently preventing German students from accessing student aid (see Herber & Kalinowski, 2019). Contrastingly, in Sweden, the high percentage of take-on of student finance implies the majority of people end up 'equally' in debt. Still, there might be factors of inequality, such as people receiving parental funding while investing their loan part at a win over the period of their studies compared to those taking it up to finance their cost of living. This raises the question of what constitutes a 'fair' or optimal financial student aid system, both in terms of economic equality and accessibility: the German redistributive case; or the universally applied Swedish system.

As with any other economic policy, when unoptimised, student funding systems can have detrimental real-life impacts on the students within the given system. This study surveys university students directly, thereby gaining insights regarding their perceptions of the student aid systems to determine whether the systems are fair or not. These real-life insights will then be incorporated into John Rawls' (1967) theory of distributive justice, giving a framework for economic equality. Distributive justice in its Rawlsian interpretation relates to the idea that

fair equality of opportunity should exist and, under the so-called difference principle, "inequality is allowed only if there is reason to believe that the institution with the inequality, or permitting it, will work out for the advantage of every person engaged in it" (Rawls, 1967, pp. 62). This research will take the Rawlsian interpretation of distributive justice as the permissible and desirable level of economic equality.

Following the introduction, section two will clarify the aim and research question. Section three will give an extensive background regarding the welfare state systems in Germany and Sweden, and how this translates into the current functioning of their systems, including descriptive statistics on uptake and amount. Section four will present John Rawls' theory of distributive justice within the literature and then continue with an overview of current empirical findings of student aid in Germany and Sweden. In section five, the research and survey design will be specified and the limitations of the chosen methodology will be presented. Section six will then focus on the survey analysis, and section seven will continue with the discussion of these results. In section eight, concluding remarks will be made.

2. Aim and Research Question

The research will conduct a case-study-based cross-country comparison of Sweden and Germany to be able to contrast the two systems within the context of economic equality and equity. To allow for an accurate cross-country comparison, there will be an initial background section on the welfare states and respective student finance systems. Building on this, the research will then evaluate a qualitative survey to gain insights from current tertiary students in both Sweden and Germany.

This leads to the research question "How do tertiary students in Sweden and Germany perceive the economic equality of their respective student aid systems?". As a major incentive of this study is to compare the systems and learn from them to improve socioeconomic inequalities in the educational context, the sub-research question will be "Which one of the student aid systems fulfils the criteria of equality better?".

Following the Rawlsian definition of distributive justice, the survey results will be analysed to determine whether the student aid systems fall under this interpretation of economic equality. Furthermore, it will point out the factors found that make each respective system either economically equal or unequal under Rawl's interpretation, focusing especially on the implications of the presence of inequalities. Overall, this research will contribute to English-speaking literature on Swedish student aid, as well as the comparative literature of Sweden and Germany.

3. Background

3.1. Types of Financial Student Aid and the Welfare Systems of Germany and Sweden

Student finance is not the only component of a student's income sources: besides this public support, there are two other main sources, namely self-earned income via work during studies and family contributions (Gwosć, Hauschildt, Wartenbergh-Cras & Schirmer, 2021, p. 170). The amount of financial student aid varies significantly across countries and is often based on the underlying welfare state system (Gwosć et al, 2021, p. 171). Therefore, to be able to compare the respective student aid systems it is of the highest importance to analyse them in their specific country context (see Cacace, Ettelt, Mays & Nolte, 2013).

Both Sweden and Germany can be classified as welfare states, meaning the state intends to provide a certain level of basic welfare to its citizens (Esping-Andersen, 1990). Esping-Andersen (1990) reflects the variation in the level of state intervention and redistribution across countries in his welfare regime typology. Sweden falls into the category of a 'social democratic' welfare state, meaning the focus is on "promot[ing] an equality of the highest standards, rather than an equality of minimal needs" (Esping-Andersen, 1990, p. 112). The egalitarian aspect of it focuses on a high level of universal welfare that allows all "full participation in the quality of rights enjoyed by the better-off" (Esping-Andersen, 1990, p. 112). Germany is classified as a 'corporativist' welfare state¹, where the focus is on "a strong commitment to the preservation of traditional family patterns (Esping-Andersen, 1990, p. 112). In these instances, social welfare is often only provided when the family cannot do so anymore (Esping-Andersen, 1990).

¹ In literature more commonly referred to as 'conservative' welfare state

In Europe, state support systems reflect these welfare state regimes. They are usually built on two principles, most commonly referred to as 'need-based' systems and 'universal' systems. Used by Gwosć (2019), the needs-based system is classified as following a 'welfare principle' (in German Fürsorgeprinzip) and the universal system a 'supply principle' (in German Versorgeprinzip).² In countries following a welfare principle, such as Germany, student aid is conditional on a weak economic background, thus often targeting rather small groups of the student population (Gwosć, 2019). The economic situation of students is usually evaluated based on parental income (Gwosć, 2019). In contrast, countries with a supply principle, such as Sweden, see student aid as an unconditional payment to students as compensation for lost income while studying, with students being seen as independent individuals irrespective of parental background (Gwosć & van der Beek, 2022).

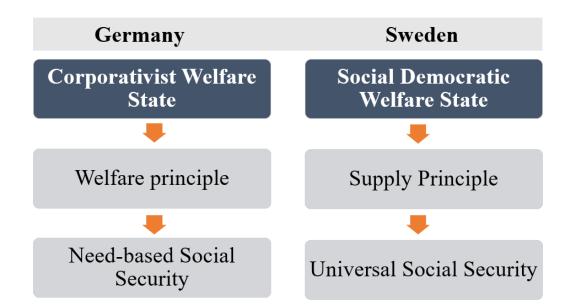


Figure 1. The welfare state regimes of Germany and Sweden and their respective state support systems. Overview by the author

The categorisations of the welfare principle and the supply principle (see figure 1) will be used throughout this research to refer to the respective student aid systems. This systematisation of Sweden's and Germany's welfare state typologies, and more specifically, that of their student aid systems, allows primarily to understand the systemic foundations that influence the survey participant's interpretation of the fairness of the respective systems.

² The English translation for the German terminology is used in the report by Gwosć et al (2021, p.171), sourcing Gwosć (2019).

Nonetheless, this research acknowledges that the student aid systems and their economic equality are not bound to their welfare state typology, allowing to assess their economic 'fairness' within Rawls' (1967) theory of distributive justice.

3.2. Student Aid Funding in Germany and Sweden

Since 2001, Sweden and Germany's student aid systems have experienced small changes but no substantial reforms, allowing for good comparability of the systems. The following sections will explain the overall functioning of the student finance systems and give some basic descriptive statistics for each of them.

3.2.1. The Swedish CSN

University students in Sweden can receive financial student aid from the Swedish Board of Student Finance, or Centrala studiestödsnämnden (abbreviated as CSN), in the form of a grant and a loan. Its main aim is to prevent social stratification and increase enrollment in higher education (Avdic & Gartell, 2015). Financial student aid in Sweden is available for all pursuing tertiary studies (Avdic & Gartell, 2015). This means it is paid independently of parental or individual income. Student financing is generally available for all Swedish citizens, as well as permanent residents and refugees below the age of 60 (CSN, 2023a). To receive CSN, the study pace has to be at 50 percent or above, and the payments will last up to 240 weeks (CSN, 2023a). In addition, a baseline amount of academic credits has to be completed to receive CSN (Avdic & Gartell, 2015).

For full-time students, so at a study pace of 100 percent, CSN currently amounts to a grant of SEK 3,652 (~322 €) and a student loan of SEK 8,400 (~742 €) at a current interest rate of 0.59 percent; with the lump sum being paid out every four weeks (CSN, 2023a). The total SEK 12,052 (~1064 €), therefore, consists of 30.3 percent grant and 69.7 percent loan. The total amount of both grant and loan is lower if the study pace is at 75 percent or 50 percent (CSN, 2023a). Students also have the opportunity to only take on the grant. An earning ceiling exists, if the amount is exceeded, it will affect the amount of student aid received (CSN, 2023a). This is currently set at 101,679 SEK (~8976 €) for every six months if the education is full-time and lasts 20 weeks over this period, relating to an average of 16,947

SEK (~1496 €) per month. Again, this amount changes with study duration and study pace. The loan repayment period will start six months after finishing studies, with the repayment having to be completed after 25 years and before the age of 64 (CSN, 2023a). Trends of the last years show that the grant uptake moves at around 90 percent of all enrolled students, and the grant and loan combination between 69 and 74 percent (see figure 2). The trends for financial student aid uptake follow the development of overall enrollment, which shows a slight upward trend (see figure 3).

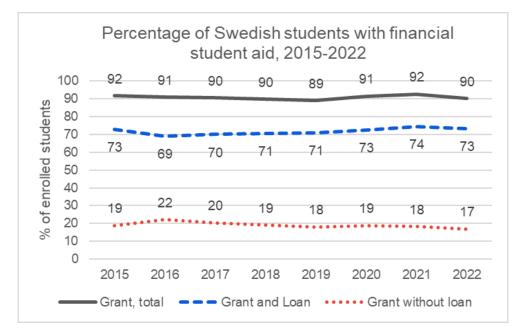


Figure 2. The percentage of enrolled students receiving the grant in total, just the grant part or both grant and loan by CSN, 2015-2022. (Source: Compiled data from CSN (2023b) and Universitetskanslersämbetet (2023))

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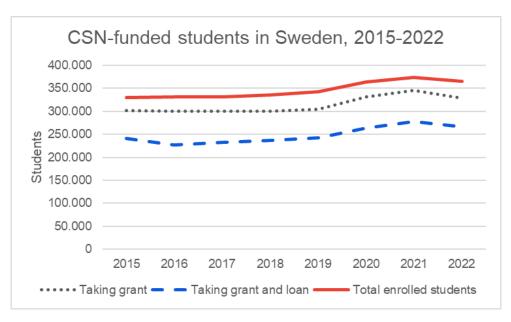


Figure 3. Total number of students receiving financial aid from CSN, divided by grant and grant/loan share (Source: Compiled data from CSN (2023b) and Universitetskanslersämbetet (2023))

3.2.2. Bafög in Germany

The Federal Training Assistance Act, or Bundesausbildungsfördergesetz, (abbreviated as Bafög) is the German counterpart to CSN. Bafög, to a limited extent, also exists for the support of students in secondary education as well as apprenticeships, but the focus of this thesis will be on Bafög for tertiary students. It is generally available to eligible German citizens, as well as permanent residents that are younger than 45 when starting their higher education (BMBF, 2022a). Students can apply for Bafög in their first tertiary education (bachelor's programme, including a master's programme that builds on the first bachelor's programme) (§ 7 BAfög; see Bundesministerium der Justiz 2023b)³.

Bafög consists of a 50 percent grant and a 50 percent interest-free loan that are means-tested, meaning initial eligibility, but also the amount paid out is based on the individual's and their parental income as well as other forms of income and assets (Steiner & Wrohlich, 2012). Bafög, however, is not the standard means of financing university studies: if parental income is sufficient and students do not have the means to support themselves (i.e. it exceeds the

³ While laws are generally not cited in the reference list, the online sources will be included for this thesis as German law is assumed to be unfamiliar to the reader.

eligibility threshold of Bafög) parents are legally obligated to fund their children (§§ 1601–1603 BGB; see Bundesministerium der Justiz, 2023a). The amount of Bafög is supposed to cover general living expenses for students from weaker economic backgrounds and varies depending on whether the eligible student still lives at home or is living in another place and whether they have private or public health insurance (Steiner & Wrohlich, 2012).

Partial coverage while living at home generally amounts to a maximum of 511 \in (~ SEK 5,786) per month, while for students living in their own place, it increases to a maximum of 812 \in (~ SEK 9,194) per month (BMBF, 2022c). For both these cases there are extra surcharges for the case of private health insurance, implying that the highest fixed rate before the means test amounts to 934 \in (~ SEK 10,575) per month (BMBF, 2022c). From these baseline rates, all counted individual, parental and spousal income gets deducted, leading to an individual Bafög rate for each student (§ 11 1-2 BAfög; see Bundesministerium der Justiz, 2023b). This is the step where the means-test is conducted. Similar to the Swedish CSN earning ceiling, students can earn up to a certain amount per month, currently set at 520 \in (~ SEK 5,888) (BMBF, 2022b). It has to be noted that for all students under the age of 25, irrespective of whether they receive Bafög or not, there are additional indirect benefits paid to the parents in the form of a child allowance of 250 \in (~ SEK 2,830) per month (§§ 1,6 BKKG; see Bundesministerium der Justiz, 2023c).

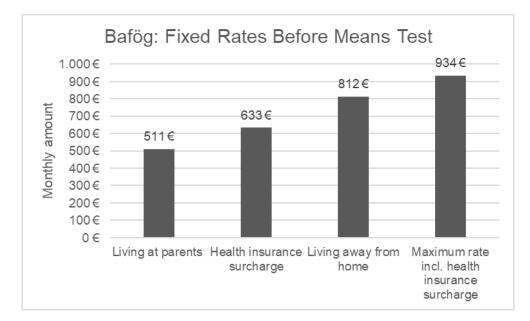


Figure 4. The fixed Bafög standard rates before individual means test (Source: BMBF 2022c)

Financial aid will only be paid until the end of the 'standard period of study' (BMBF, 2022a). This is usually set at six semesters for a bachelor's degree and four semesters for a master's programme. Payback of the loan part (which will accumulate to a maximum of 10,010 \in (~113,500 SEK) irrespective of the actual accumulated debt) will start five years after the stop of funding (BMBF, 2022a). According to the BMBF (2022a), this amount is usually paid back within 6.5 years. Lastly, there are various special regulations to receive or not receive Bafög, for cases such as a change in study field, studies abroad or Bafög-eligible siblings (§§ 1–30 BAfög; see Bundesministerium der Justiz, 2023b).

Over the last years, Bafög showed clear trends in uptake and amount: for students that do receive Bafög, the monthly average of funding received per person showed a positive trend, with an increase from 436 \in (~ SEK 4,937) in 2010 to 514 \in (~ SEK 5,820) in 2019 (Statistisches Bundesamt, 2022). However, official data shows that general eligibility in 2019 fell to 60 percent (from 67 percent in 2010), of which only 18.8 percent gained funding (27.3 percent in 2010), relating to 11.27 percent (18.4 percent in 2010) of all students (Deutscher Bundestag, 2021, p. 17). This represents a general trend of a total declining amount of students receiving funding compared to a more pronounced total increase of tertiary students (see Figures 5 and 6). While a large number of initially eligible students do not get Bafög due to failing the means-test, other reasons for the non-uptake of Bafög despite eligibility are often attributed to the bureaucratic application process or the desire to work for their income to gain a larger income (Herber & Kalinowski, 2019).

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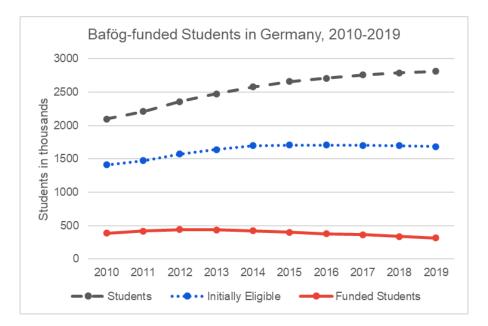


Figure 5. Development of student enrollment, Bafög-eligible students and funded students, 2010 to 2019 (Source: Deutscher Bundestag, 2021)

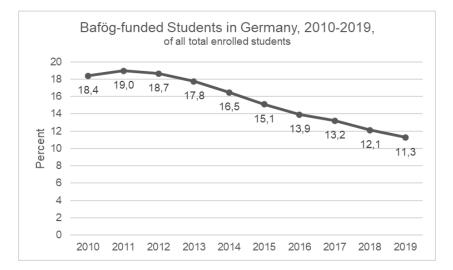


Figure 6. Development of Bafög-funded students in Germany, 2010-2019 (Source: Deutscher Bundestag. 2021)

4. Literature Review

The following literature review will first analyse literature on Rawlsian distributive justice as the theoretical framework, focusing on the original theory and then its use in relation to educational fairness. After this, the empirical literature on student aid in Sweden and Germany will be presented.

4.1 Review of the Theoretical Framework:

In socio-economic and philosophical theory, distributive justice is used to determine how to "cover the distribution of benefits and burdens of economic activity among individuals in a society" (Lamont & Favor, 2017, n.p.). Theories of distributive justice are generally used to present issues and corrections to current macro-level institutions rather than describing an ideal society; and provide moral guidance to otherwise often utility- and efficiency-focused economics (Lamont & Favor, 2017). John Rawl's (1967) interpretation of distributive justice is only one of several distributive principles. Its primary characteristic is that it attempts to "improve the lifetime prospects of the least advantaged in society" (Lamont & Favor, 2017, n.p.), while also accounting for factors such as the necessity of economic productivity and the aforementioned 'difference principle'. Compared to theories that, for instance, focus on pure redistributive equality, the Rawlsian theory is more built to evaluate real-world issues. For analysing large-scale student aid systems in a cross-country comparison, this theory, therefore, seems adequate.

Rawl's (1999) theory of distributive justice bases on two principles of justice that are formulated as:

First: each person is to have an equal right to the most extensive scheme of equal basic liberties compatible with a similar scheme of liberties for others.

Second: social and economic inequalities are to be arranged so that they are both

- a) reasonably expected to be in everyone's advantage, and
- b) attached to positions and offices open to all (Rawls, 1999, p. 53).

The foundation of his theory, equal basic liberties, includes, among others, the right to political participation, freedom of speech and thought, and personal integrity (Rawls, 1999, p. 53). Stein (2014) highlights that the second principle of justice accounts for inequalities that arise based on "activities of individuals as they exercise their basic freedoms" (p. 53). 2 a) is referred to as the 'difference principle', being the only position from which inequality is allowed, as it benefits the least advantage. 2 b) is referred to as 'fair equality of opportunity' (Rawls, 1999, p. 63) and positions open to all refer to "positions of authority and responsibility" (Rawls, 1999, p. 53). These principles of justice follow lexical priority (Lamont & Favor, 2017), meaning after the fulfilment of the basic liberties, inequalities can

only exist if they are benefiting the least advantaged and then lastly, if everyone has the equality of opportunity of accessing positions of relevance. All remaining inequalities that do not fulfil the two subsets of the second principle are considered injustices (Rawls, 1999, p.54). An overview of the two principles can be seen in figure 7. Overall, the Rawlsian interpretation of distributive justice focuses on reducing absolute inequality by increasing the position of the least advantaged, rather than relative inequality by using a purely redistributive system (Lamont & Favor, 2017).

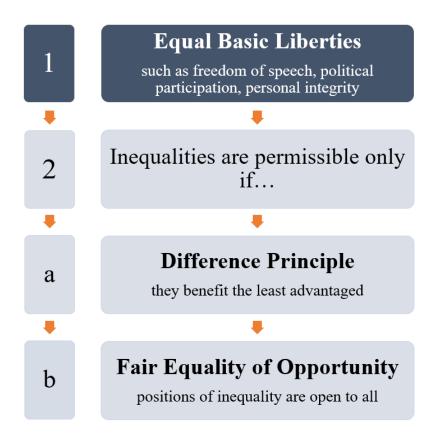


Figure 7. A schematic overview of John Rawls' theory of distributive justice. Overview by the author

4.1.1 Other Literature on Distributive Justice and Education:

There is little literature that applies Rawlsian distributive justice to educational policy, and more specifically, on financial student aid. One outlier to this is Stein's (2014) doctoral dissertation on the distributive justice of standardised educational testing by analysing case studies in the US. He compares efficiency-focused testing with justice-focused testing based

on Rawlsian philosophy to argue for the latter. While his analysis context differs from this research (standardised testing versus student aid funding), his interpretation regarding distributive justice relating to education is helpful to understand the application of Rawls' theory in practice and to extend it to the case of student financing for this research.

According to Stein (2014, p. 73), John Rawls himself gives only limited application of his theory on education. When mentioning it, Rawls (1999) highlights that "resources in education [should be allocated] so as to improve the long-term expectation of the least favoured" (p. 87), again only allowing permissible inequalities under the difference principle. Education should lead to not only "economic efficiency and social welfare" (p. 87), but also facilitate cultural and societal participation according to every person's self-worth (Rawls, 1999). Rawls (1999) highlights that financial resources should be allocated according to this idea (p.92).

Stein (2014, p. 75) extends Rawls' statements on education to the theory of distributive justice and argues that the educational system should fulfil Rawls' two principles of justice while also facilitating people to freely decide on their future professions. This connection will also be used for this research, where the student finance system is seen as a part of the educational system. While Stein (2014, p.80) primarily focuses on primary and secondary universal schooling as necessary to fulfil its role as a basic liberties to society, he argues that there is an obligation to provide as much education to fulfil every individual's freedom of social and political participation that Rawls argues for. With currently high participation rates in tertiary education and the increasingly skill-based labour market, it can be argued that university education can be considered as part of this "amount owed" to participate in today's society.

Any other literature focussing on the general redistributive state of the respective student aid systems (see for instance the categorisation of the student finance systems into need-based and universal student aid in the Background section) remains rather descriptive and does not focus on the normative 'justice' element of distributive justice. There are sporadic normative conclusions, such as by Baum (2007) for the US context, who argues that a non-means-tested distribution of student aid would negatively impact students from economically weak families due to the reduced availability of funds. As this conclusion, however, emerges from the high-tuition and low-taxation context of the US, it is unlikely that this can be applied to

the European welfare state system. Due to the lack of literature, this research will add to the literature by not only offering normative conclusions regarding the fairness of student aid systems in Germany and Sweden but also by relating John Rawl's (1967; 1999) distributive justice principles to student finance in a European context. Furthermore, as the focus of the theory is also on the subjective interpretation of an individual's self-worth, a qualitative survey based on the students' own perception will ensure that the analysed answers are in line with the factors that are controlled for within Rawlsian distributive justice.

4.2 Empirical Literature

For the empirical literature review, there is literature present that focuses on student aid in Sweden and Germany, though less for the former. It is mostly concerned with the effect of student aid on both overall enrollment, working during studies and time to graduation, often focusing on students from economically weaker backgrounds. For Sweden, Avdic and Gartell (2011) find that the 2001 student aid reform, which entailed stricter repayment scheme, as well as an increase in the grant share and the income ceiling, shortened the time to graduation, but only for students from an academically stronger background. They argue that a decrease in study time is beneficial as it increases the time income can be earned after graduation. To reach higher economic equality, however, a decrease in study time for students from academically weaker families would be needed too, an argument speaking against an equalising effect of the Swedish system. In their 2015 paper, they argue that the reform also pushed students from weaker economic backgrounds into work, putting them at a disadvantage compared to their peers (Avdic & Gartell, 2015). However, as both their papers focus on the time period before 2010, it is unclear whether these effects persist or were evened out. There is little other English-speaking literature available analysing the Swedish case.

For Germany, Steiner and Wrohlich (2012) find a small positive effect of means-tested student aid on enrollment, as well as a shortening of the transition period from high school to university. When analysing the 2001 Bafög reform in Germany, which entailed both an increase in received amount as well as an increase in general eligibility, as a natural experiment, Baumgartner and Steiner (2006) find that the reform raised tertiary enrolment by only 1.5 percent. Herber and Kalinowski (2019) note that in Germany, a large share of the

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initially eligible students not taking up Bafög comes from economically weaker backgrounds. They note, however, that students growing up in the location of the former GDR (German Democratic Republic) are more likely to take on Bafög. As reasons for the generally low take-up of Bafög, they state factors such as lacking support in applying for the funds and argue that easing the bureaucratic application process would likely increase the number of students taking on aid, preventing dropouts and increasing the decision to study in the first place. In addition, they note that eligible students that decide against taking Bafög often work more hours to support themselves, potentially increasing the chance of a dropout of their higher education.

Behr and Theune (2016) support this argument: they find that students who work are usually from a non-academic and weaker economic background. They often not only take more time to finish their degree but also show a worse academic performance compared to their non-working peers. Impacts of their delay in entry to the labour force is reflected in forgone earnings and worse job-matching (Behr & Theune, 2016). Staneva (2017) highlights that while many students in Germany work independent of their financial background, students from non-academic and low-income backgrounds often take on jobs with lower qualifications. This puts them at a disadvantage to their peers from a higher socioeconomic background who often take on jobs that are not only related to their field of study, but are also beneficial to their future career. She argues that it needs better financial support for their studies as well as consultation regarding costs and benefits of different jobs while studying. Regarding the total amount of student aid received by each student, Glocker (2011) finds that an increase in financial student aid reduces the probability to drop out compared to students from low-income backgrounds that do not take up Bafög.

4.2.1 Comparative insights on Sweden and Germany

There are few direct comparisons between the Swedish and German systems, which makes this research interesting and relevant. One European report by Guille (2002) presents, among others, the German and Swedish context from the beginning of the 2000s: here, she contrasts the aforementioned differences in accessibility and eligibility. A report by the European Commission, the EACEA and Eurydice (2020) analyses all EU student loan and fee systems, giving more up to date information on the differences between need-based (e.g. Germany)

and universal (e.g. Sweden) schemes for student aid. However, both sources find themselves to be rather descriptive, highlighting the need for an in-depth analysis of the benefits and disadvantages of the systems. The report also highlights the strengths and weaknesses of different funding sources, which can be used to gain more insights into the Swedish and German case: for family contributions, common in Germany, it notes the often easy accessibility of funds to students at the cost of an increased dependency of adult students on their family. For individual income through working while studying, something that is seen in both Germany and Sweden, the report highlights the aforementioned negative effect on studies this might have. Nonetheless, it notes that this might reduce dependence on family members. For public support, common in Sweden, students are more independent in their income, though the funding source, taxation, generally limits the amount available to students.

Gwosć and van der Beek (2022) present a more normative analysis of the German needs-based student aid system following the welfare principle; and what would speak for reforming the aid system to a universal system following the supply principle such as the Swedish system. While Gwosć and van der Beek (2022) do not explicitly point out the Swedish case, they highlight the systemic differences and the respective benefits and disadvantages of these student aid systems. They find that countries following the welfare principle show significantly higher numbers of students in serious financial difficulties than in countries with a supply principle, with 26 percent in Germany compared to 15 percent in Sweden (Gwosć and van der Beek, 2022, p. 483). However, none of the student aid systems show a significant impact on the representation of students from weaker socio-economic backgrounds. Gwosć and van der Beek (2022) also point out that as the sample size of the countries analysed is small, it is difficult to show statistical significance for systemic differences. Nonetheless, they argue that 'well-founded speculation' based on comparing their characteristics might prove valuable to argue for a systemic change. This understanding gives further value to a qualitative approach to this thesis research, that can circumvent the limitation in the quantitative area with the later analysed survey of Swedish and German participants representing the two different welfare state systems.

Overall, the empirical findings give little recognition to the concrete equality of the student aid systems in Germany and Sweden. Nonetheless, the above mentioned findings give a good understanding of the real-life impacts of CSN and Bafög and related critiques. They can be

used to contextualise them within the following survey discussion on the perception of equality and fairness by Swedish and German university students. Beyond the costs and benefits of the underlying welfare and supply principle, there are few concrete comparisons of the analysed countries. This arguably gives reason to conduct further research to add valuable insights to the literature.

5. Methodology

5.1 Research Design

To answer the research question, an exploratory qualitative approach is taken to conduct a case-oriented comparative research design of Sweden and Germany. This form of cross-country comparison is especially suited to reflect the complexity of those macro-level institutions (Cacace et al, 2013). The qualitative research gathers primary data on students' perceptions of the student finance systems in terms of economic equality. The focus on personal opinions specifically supports the aforementioned focus of Rawlsian distributive justice on the individual perception of equality. This is done using two semi-structured surveys for each country with participants that take on student aid, as well as those who do not. While surveys are usually used for quantitative research, it is here deliberately used for a qualitative context. This is because it allows for a better representation of the target population, namely tertiary students across a broad range of faculties, as well as economic and geographic backgrounds. Braun, Clarke, Boulton, Davey and McEvoy (2021) argue the value of qualitative surveys for the comparability of different groups. Especially as the researched population consists of two groups, tertiary students from Sweden and tertiary students from Germany, this approach will therefore be useful.

As the goal is to analyse the two countries on whether they fulfil the theory of distributive justice or not, a deductive approach is taken. This entails using the two principles of justice in their lexical order (entailing 'equal basic liberties', the difference principle, and 'equality of opportunity') to test the data on whether they fulfil the criteria or not. For this, a thematic analysis via manual coding of the data is conducted (see Figure 8). This is to account for the large amount of material from the qualitative survey. As a first step, relevant codes are determined that are grouped into overarching themes that are then analysed within the

theoretical framework. All themes and codes can be found in table 1. As the theory used is one that either confirms or rejects equality within the systems, the codes are created in opposing couples (such as independency - dependency) to search the text for validating or dismissing criteria. This also allows to reduce a potential confirmation bias of the pre-chosen themes and codes. Within the results and analysis, answers might be supplemented with further background information to better contextualise the answers. Furthermore, relevant insights will be quoted or paraphrased. As the theory is either rejecting or confirming the presence of economic equality of the respective student aid systems, the chance of a confirmation bias due to the deductive approach is reduced.

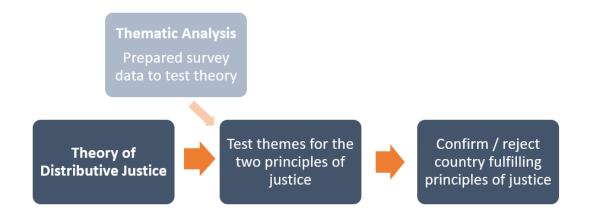


Figure 8. Schematic overview of the deductive approach taken for the data analysis. Overview by the author

Table 1.	Codes and	Themes for the	Thematic Analysis
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Theme	Codes	Code Specifications
Equal basic liberties Free and independent choice in educational pursuit	 Independence Dependence 	'Independence' is assigned if participants express that they were able to fulfil their individual decision to pursue higher education, both in regards to financial independence and independence from parents If those criteria are not fulfilled, 'dependence' gets assigned.
Difference Principle Any inequality in the system benefits the least advantaged	 Benefits to worst off Detrimental to worst off Universality 	 'Benefits worst off' is assigned if the participants perceive that something in the student aid system benefits the least advantaged. 'Detrimental to worst off' is assigned if the system leads to a disadvantage of the worst off 'Universality' is assigned if something is accessible for all. This implies the presence of some parties benefiting more than others, but also benefiting the worst off.
Fair Equality of Opportunity In accessing and maintaining financial support, also in relation to repayment conditions of future debt.	 Accessibility Inaccessibility Reliability Unreliability 	 'Accessibility' is assigned if participants perceive that financial support (student aid, parental funding) in their respective system is easily attainable. If this does not apply and students are limited in accessing financial means to continue their studies, 'inaccessibility' is assigned. 'Reliability' is assigned if students perceive that there is little disruption or insecurities for their financial support, implying they can fully focus on obtaining education without having to put unreasonable energy in securing their living standards. 'Unreliability' is assigned if the criteria of 'reliability' do not apply.

5.1.1 Distributive Justice for Testing Purposes

This section will briefly present the testing criteria based on the theory of distributive justice in relation to education. These criteria also pose the in table 1 shown themes. While the theoretical literature review already allows for a general insight into the relationship between the theory and education, this section will briefly specify how the principles of justice can be tested in relation to the personal perception of the surveyed students. When testing for the first principle, equal basic liberties, regarding student finance allowing educational attainment, it is of importance to check the survey answers on whether students are not limited by the financial student aid system in attaining or following their education. Within their respective systems, students should be able to follow their individual choices to be able to exercise their education without being limited by other factors. If students overall do not feel limited to obtain education, the system's base is found to have an equitable focus fulfilling the first principle of distributive justice.

When testing for the second principle, so the existence of any further allowed inequalities, the analysis will focus on whether the student aid systems in each country fulfil the two subcriteria or not. The focus will first be put on the difference principle. This implies testing whether people perceive that if there is an inequality in the student financing system, it still benefits the overall student population in accessing education. This could, for instance, include people from wealthy backgrounds receiving student aid they might not necessarily need, or some students receiving more funding through their parents than others; so long the least advantaged gain from it. Second, it will be tested for fair equality of opportunity. For this research, this will be related to whether all students have a fair and reasonable opportunity to access financial support within their system. This relates to both financial student aid as well as parental funding.

The final determination of the fairness of the system will be made by looking at to what extent each country fulfils all the criteria. This will be done in the discussion in section 7. As the theory of distributive justice does aim to provide guidance to a better society rather than prescribing an ideal solution (Lamont & Favor, 2017), this research assumes that a country does not need to perfectly fulfil the criteria. Rather, the goal is to determine which of the two countries has a more equal student aid system in place. This implies strong involvement of

the researcher in this position and, therefore, has to be conducted carefully by following the theoretical framework to prevent personal bias.

5.2 Survey Design

The sampling method is conducted as a non-random partial snowball sampling method to get a high amount of responses while also accommodating an adequate representation of participants from different socio-economic and demographic backgrounds. This is done by distributing the survey online via primarily social media channels such as Instagram and Facebook and asking participants to encourage other tertiary students to fill out the survey. Conducting qualitative surveys online and anonymously will also increase participation (Braun et al, 2021). In addition, it also increases the likelihood of students from different backgrounds answering the survey. As it is conducted online, the role of the survey conductor will be passive, reducing potential bias at this step of the research process. The responses, however, will most likely include a voluntary response bias by the participants. The sample size is set to be 20 individuals for each population group (i.e. Sweden and Germany).

As the goal of the survey is to analyse the individuals' perceptions, a large part of the questions are open-ended. There are, however, initial close-ended questions regarding their socio-economic and demographic background as well as their student aid status to control the results. Due to the larger number of individuals in the survey, the participants are encouraged to write around two or three sentences at most for each question. Generally, all participants within each country group receive the same questions for comparability. However, in the survey design, differing realities on the take-up and non-take-up of student aid have to be considered. This is especially important for the case of Germany, as students eligible for student aid might have very different experiences regarding accessibility compared to students who know from the start that they are not eligible at all. Generally, the questions for both population groups are posed as similar as possible. However, as the systemic backgrounds of Bafög and CSN differ drastically (regarding factors such as general conditions or percentage of students being eligible), the questions are adjusted for their respective systems. Furthermore, German respondents had the possibility to answer in either English or German. All questions are found in the appendix (see section A1 to A3).

5.2.1 Survey Limitations and Bias:

This survey-based research brings multiple limitations as well as potential biases with it that will be elaborated on in the following section. First, one of the major limitations of this research proposal is the focus on tertiary students regarding the distributive justice of the systems. A crucial argumentative line to determine the holistic economic equality of the financial aid systems, however, is the funding side, namely the taxpayers. In the case of universal student aid in Sweden, one might argue that low-income taxpayers might not benefit from the redistribution to economically better-off students. Yet, there might be a benefit accruing in the form of a more educated labour force, and thereby higher future tax income redistributed back, in the long run. This aspect is highly relevant to analyse but does not fit into the current scope of this research. Another limitation in the survey's focus on tertiary students lies in the non-inclusion of people that decided against tertiary education due to financial constraints in the first place. For this, it would need a larger scale survey.

Second, to prevent misinterpretation of the survey responses, all the content has to be controlled for several factors that might impact the perception of the financial student aid system. This includes amongst others the welfare state systems of both countries and how they are generally accepted, but also the bias created through the selection of the interview participants. To prevent bias, I will also exclude any direct country-comparison questions in the interviews (except one question regarding the hypothetical introduction of the respective other system) so that the participants won't be influenced by the perceived advantages of the other system. Furthermore, the above mentioned variation in the questions for each country group has to be considered in the analysis.

Third, due to the survey's qualitative nature, it is to be expected to receive less responses. In order to determine the representativeness of the sample size on the general student population, the survey will, as aforementioned, control for basic socio-economic and demographic characteristics that can be compared with the characteristics of the total student population in Germany and Sweden.

5.3 Survey Implementation

The surveys were sent out via google forms following the planned survey design. As the focus was to gain a relatively representative sample, a partial snowball sampling method was used to specifically ask survey respondents to forward the survey to people both receiving and not receiving student aid in their respective countries. This was especially helpful for the German survey as it allowed to find students who take on Bafög. The surveys were closed once the approximate sample size was reached, standing at 22 respondents for the German survey and 24 respondents for the Swedish survey. It has to be noted that there is a variation in the amount of answers each question received, reflected in a variation of respondents for different questions in the analysis.

6. Analysis

The analysis will start with an initial overview of demographic and socioeconomic statistics to give an understanding of the composition of the surveyed population. After this, the main focus lies in the analysis of the themes with their respective codes to control whether they align with the Rawlsian criteria of distributive justice or not. This will be done first for Germany and then for Sweden.

6.1 Characteristics of the Survey Population

The German survey showed most respondents to be younger than 23 (61.9 percent) and 38.1 percent between 23 and 25. The gender distribution was skewed towards female respondents (76.2 percent) and only 23.8 percent male. The Swedish survey showed most respondents to be between 23 and 25; 29.2 percent younger than 23 and 12.5 percent between 26 and 30. The gender distribution was not entirely representative but more balanced than the German survey, standing at 62.5 percent female and 37.5 percent male. For the study level, Sweden showed a representation of 75 percent bachelor students and 20.8 percent at the master level. The German survey showed 77.3 percent in their bachelor programme and 22.7 percent in their master degree. For the representation of faculties, the German survey showed a more diversified mix of faculties than the Swedish survey, the latter showing an overrepresentation of Economics and Business with 52 percent of this group's respondents.

When asking students about their financial situation (see Figure 9), 54.2 percent of the Swedish survey respondents said that their monthly allowance is sufficient to cover their expenses, 33.3 percent argued it is sufficient most of the time and 12.5 percent said it is not enough. For the German survey, only 45.5 percent argued that it is enough money, 50 percent argued that it is sufficient most of the time and 4.5 percent argued it is too little. For the survey population, it shows that overall there are fewer students feeling financial strain in Sweden than in Germany, though the former shows a higher percentage of people arguing it is not sufficient at all.



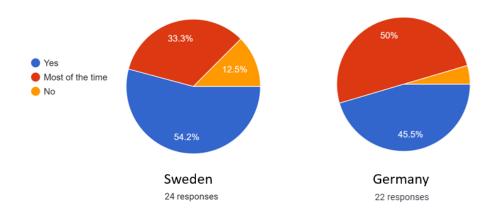


Figure 9. Respondents' perceived financial situation. Overview by the author

The survey also gave insight into the eligibility status of the respondents. For Germany, 77.3 percent of the participants state that they are not eligible for Bafög, 18.2 percent are eligible and take up Bafög, and 4.5 percent are eligible but do deliberately decide against taking it. Correspondingly, 13.6 percent of the respondents rely on other income besides Bafög. 4.5 percent rely only on Bafög to cover their living expenses. For Sweden, 83.3 percent are eligible for CSN and take both the grant and loan part of it, and the remaining 16.7 percent are only taking the grant part of CSN. None of the Swedish respondents decided completely against taking any part of CSN. 37.5 percent of the respondents only rely on CSN to cover their monthly expenses, while 54.2 percent rely on other income besides CSN. 8.3 percent argue they completely rely on other income sources. While this does not exactly reflect the percentages of student aid uptake seen in the Background section for both countries, it can be argued that the data reflects the general trends of low uptake in Germany and high uptake in Sweden.

6.2 Egalitarian Perception of the German System

6.2.1 Equal Basic Liberties in Germany

Under the theme of 'Equal Basic Liberties', the codes 'independence' and 'dependence' were used. Relating to the free and independent choice in the students' educational pursuit, the survey answers showed a mixed but slightly negative image of the fulfilment of the criteria. When asked about the benefits of Bafög, 10 of 16 respondents pointed out that it generally facilitated students from weaker economic backgrounds to study. When asked to reflect on whether the current way of financing students in Germany eased their decision to study, 13 of 16 respondents argued that it did not have any significant impact, as they could rely on parental support, highlighting that their individual decision to study was not influenced by the system. Contrastingly, 3 of 16 respondents argued that it did not ease their decision due to financial worries. Yet, one of those three respondents argued that while he initially decided against studying, Bafög eventually facilitated his pursuit of a university education. When asked about the main disadvantages of the current system, five of 18 respondents pointed out the high dependence of students on their parents. They argued that there is not only a parental dependency of the eligible students that have to hand in income statements of their parents to receive Bafög, but also the dependence of non-eligible students on their parents providing them with enough funds. One respondent here highlights the potential of parents refusing support completely or making it conditional. This could prevent students fully from studying, or force them into a field they might not want to pursue. Reflecting on the Swedish system to be implemented in Germany, 13 of 19 respondents argue that the Swedish system would be fairer. Arguments are that it would not only increase financial freedom but would also reduce dependency on parents. One respondent argued: "Generally, I don't agree that a one-size-fits-all solution leads to a fairer society. But it simplifies the process [of student aid] a lot, as you don't have to do [income] calculations. It also reduces feelings of shame and gaps within societal groups"⁴. Thus, while students see an initial benefit to the independence of students by Bafög existing; and generally do not perceive their study decision to be

⁴ Translation, in German: "Eigentlich bin ich nicht der Meinung, dass eine one-size-fits-it-all Lösung zu einer grundsätzlich gerechteren Gesellschaft führen kann. Allerdings erleichtert dies den Prozess erheblich, da die Berechnung wegfällt und führt auch zu weniger Schamgefühlen und Kluften innerhalb einzelner gesellschaftlicher Gruppen.

influenced by the system, financial and parental dependence can be assumed to prevent the criteria of 'Equal Basic Liberties' being completely fulfilled.

6.2.2 The Difference Principle in Germany

Under the theme of the 'Difference Principle', the codes 'Universality', 'Benefits to worst off' and 'Detrimental to worst off' were used. They were chosen as they determine whether present inequalities benefit the least advantaged students or not. Again, answers showed mixed to negative responses. Following the same argumentation as for the previous section, 10 of 16 respondents also highlighted that Bafög generally benefits the worst off. The arguments mostly focused on whether it increased equality as it facilitated people to study who would otherwise be limited in attending higher education. Yet, when explicitly asked about whether they perceive Bafög as fair, only 3 of 17 respondents argued so, primarily due to the redistributive nature benefiting students who are in need. Here, 7 of 17 respondents also argued that they would welcome an expansion of Bafög to benefit more people. Throughout the survey, negative effects of the system were mentioned. One participant highlighted that they perceive Bafög to increase social stratification, as it is exactly students from weaker economic backgrounds that will then end up in debt, in comparison to students who are supported by their parents. In addition, another respondent pointed out that for non-eligible students, parental financing varies a lot. One respondent stated: "I am not eligible for Bafög, but my parents don't support me financially. At the end of the month, this often leads to me eating pasta and pesto"⁵. One Bafög-respondent argued: "You won't get rich from Bafög. Especially in Munich you are barely scraping subsistence level". Furthermore, many answers were mixed concerning the 'Difference Principle'. One student argued that despite them finding it fair that the financing is for students from weaker economic backgrounds, "it increases disparities and students taking Bafög are at a disadvantage as they have to pay back part of the money at the start of their working career"⁷. Concerning the comparison of the Swedish and German student aid systems, 5 of 19 respondents argued that while they understood the benefits of the Swedish system, they still see the merit of the

⁵ Translation, original in German: "Ich bin nicht Bafög berechtigt, meine Eltern unterstützen mich aber nicht finanziell. Führt teilweise echt dazu, am Ende des Monats nur Nudeln mit Pesto zu essen."
⁶ Translation, original in German: "Von Bafög wird man nicht reich. Man kratzt vor allem in München komplett am Existenzminimum."

⁷ Translation, original in German: "Es [verstärkt] Ungleichheiten und Bafögbeziehende sind benachteiligt beim Start in das Arbeitsleben weil sie einen Teil des Geldes zurückzahlen müssen."

German system. One respondent argued: "In the case of very privileged students it would be thrown out money". Concluding, while many students see the initial benefit of the system to students from economically disadvantaged backgrounds, the majority of respondents see a detrimental effect of the system, especially in relation to the realities of Bafög, on the students already at an economic disadvantage, implying only a partial fulfilment of the 'Difference Principle'.

6.2.3 Fair Equality of Opportunity in Germany

When analysing the theme of 'Fair Equality of Opportunity', the codes 'Accessibility', 'Inaccessibility', 'Reliability' and 'Unreliability' were used. With them, it is possible to control whether students are equally able to easily access and maintain financial support, both from student aid and parents. Here, responses predominantly were negative to the fulfilment of the criteria. One aspect where Bafög was found to be reliable is in regards to the repayment conditions, which 5 of 16 respondents pointed out when being asked about the benefits of Bafög. This was further supported by all four of the students receiving Bafög in the student sample arguing that they are not too worried about future debt. Arguments included that repayment conditions were very good. When asking whether the current system in Germany makes university studies more or less stressful, opinions were split: while 7 of 17 respondents argued that it made their studies less stressful, mostly as they could rely on parental support; another 7 of 17 respondents argued that it increased the stress. Arguments mostly revolved around having to work while studying and also general financial insecurities that made their income unreliable. One student taking Bafög argued that while receiving financial student aid in the first place reduces stress while studying, the repeated reapplications and insecurities about the approval created recurring stress. Furthermore, three of four respondents receiving Bafög stated that they have, or have had, worries about funding cuts. Reasons for this included tight documentation deadlines to remain eligible for Bafög, a change in eligibility status due to their siblings graduation from high school and a change in degree requiring special statements from the student. Lastly, one recurring theme throughout the survey was the bad accessibility of student aid. When asked about the main deficits of Bafög, 11 out of 18 respondents stated the lengthy application process and immense bureaucracy. Further 5 of these 18 respondents mentioned delayed payments and uncertainty regarding the amount of funding they will receive. When asking students that have in the past applied, 8 of 11 respondents repeated the same issues and further added problems such as

unclear regulations and little digitalisation. Relating to the large amount of documentation needed, such as parental income statements and rental contracts, one student stated: "*And if you think you handed it all in, you'll get a letter two weeks later stating that they need even more documents*"⁸. Overall, students perceived both accessibility and reliability of the German student aid system to be bad, speaking against the fulfilment of 'Equality of Opportunity'.

6.3 Egalitarian Perception of the Swedish System

For the following section, the thematic analysis will be conducted following the same themes and codes as the previous section. For uncertainties regarding this, refer to the previous section or the overview of codes and themes in table 1.

6.3.1 Equal Basic Liberties in Sweden

For the theme of 'Equal Basic Liberties', responses from the Swedish survey were generally positive for the fulfilment of the criteria. When being asked about the general benefits of CSN, 13 of 22 students pointed out that it allowed all students to study independent of their socio-economic background, as well as independent of their parents' influence. Highlighting the independence of the student, one respondent stated that it makes "the question of someone's education an individual choice which is not dependent [...] on the student's parents' opinion". Another student highlighted that CSN being available to all "makes education a[sic.] private matter of the student". When asked about whether CSN made their decision to study easier, 18 of 22 respondents argued that this was the case. Listed reasons included that it facilitated them to study in the first place, or that it increased the possibilities of their choice of location of study. To the question of whether they would have decided against studying if CSN was not in place, 8 of 21 respondents stated that they would have decided against studying. This shows that CSN, to some extent, facilitates the independent choice to study. On the other hand, 5 of these 21 respondents also argued that they would have made their decision to study independently of CSN. When asked whether the current system made their decision to study more or less stressful, 11 of 21 respondents argued it reduced stress. Arguments for this included independence from parents.

⁸ Translation, original in German: "Und wenn man meint, dass man alles gemacht hat, kommt zwei Wochen später ein Brief mit 'Reichen Sie bitte noch Das und Das ein'"

Nonetheless, certain aspects of CSN that increased dependence were pointed out. When asked about the downsides of CSN, 6 of 21 respondents argued that it discouraged them to work while studying. Despite the focus of the study being on education and financial student aid, this shows a limitation of their independence to choose freely how to pursue their studies and financially support themselves. Yet, when being asked to compare the German student aid system to the Swedish one, multiple students pointed out that this would be a much higher dependence, highlighting the independence of the Swedish system. Thus, the general perception of students in Sweden implies that there is a high level of independence present in the Swedish system, be it in regard to financial freedom or individual decision making. Conditions for 'Equal Basic Liberties' seem thus fulfilled.

6.3.2 The Difference Principle in Sweden

When testing for the theme 'Difference Principle', the Swedish answers supported that the system benefits the worse off. When asked about their opinion on CSN being available to all, 21 of 22 respondents argued that it is fair that the system is universal. Arguments supporting the case include that it allows to account for different living costs across the country, while still covering basic costs for all students. Therefore, the least advantaged are made better off through the system. One student pointed out that while he sees the system as fair, some students from higher socioeconomic backgrounds might "exploit CSN as a 'smart' loan". Yet, following the concept of the 'Difference Principle', despite this inequality, the worst off still benefit in this case. When asked about worries due to future debt from student loans, 16 of 21 respondents argued that they are not worried about it. Reasons included amongst others the expected higher income after graduation and the argument that everyone will be in the same situation. This universality is therefore interpreted that no one will end worse off than others. When asking the Swedish students to compare their system to the German one, 16 of 22 respondents stated that they found the German system unfairer; for instance, as it would increase social stratification, and overall limit educational access and the benefits reaped from it. "Assuming that pursuing higher education will contribute long term to a country's economic growth it should be financed regardless of social class and income", one respondent argued. This further supports the case that Swedish students perceive their own system as being more beneficial to the least advantaged.

6.3.3 Fair Equality of Opportunity in Sweden

Lastly, the theme of 'Fair Equality of Opportunity' in Sweden was analysed. The answers predominantly spoke for the reliability and accessibility of the system. One respondent stated that it "removes underlying worry" of financial difficulties, and another student pointed out the function of CSN as a 'safety net'. When asked about the application process to CSN, all of the 22 respondents highlighted the application process as very uncomplicated. This high consensus shows the great accessibility of student aid. Furthermore, 10 of 22 students attested that the benefit of CSN lies in the reliability of the system by pointing out continued low interest rates and the function of CSN as a consistent source of income during their study period. The general consensus was there that it allowed a reasonable standard of living. This was also supported when asked whether the current system made their studies more or less stressful: here, 11 of 21 argued that it was less stressful as the income from CSN presented a very reliable income that reduced the need to balance work with studies. When asking students whether they have ever worried about the withdrawal of financial aid, 13 of 22 respondents stated they had none, speaking for the reliability of the system. Only four of those 22 respondents stated they have had worries, those were based on either a too high income of working while studying, or the potential of failing classes. Thus, on top of the high consensus regarding the accessibility through the application process, most students perceived CSN as providing a reliable income source that allows them to focus on their studies. This speaks for 'Fair Equality of Opportunity' being fulfilled.

7. Discussion

7.1 Distributive Justice in Germany and Sweden

The following section will contextualise the analysis for both countries within the theory of distributive justice and previous findings in the literature to get comparative insights into the two systems. It has to be noted that the discussion of the Swedish results will be shorter. This is due to the high consensus amongst answers of Swedish students and the lack of English-speaking literature on the topic of CSN.

For the German needs-based student finance system, the criteria for distributive justice are overall insufficiently fulfilled. The first principle of justice, 'Equal Basic Liberties', is only

partially attained. Students do not feel barred from pursuing tertiary education but do believe that financial insecurities and parental dependence limit their independent decision making regarding education. While there is initial general support for the redistributive system, this can be argued to be owed to the wide acceptance of the corporativist welfare state system. Following Esping-Andersen's (1990) argument, this focuses rather on the maintenance of the family as a social unit to help their children rather than providing immediate financial support. Yet, as seen when testing for the difference principle, this reliance on family support brings many pitfalls with it. Despite the legal requirement of parents to support their children financially (see Background, 3.2.2), surveyed students pointed out that this does not always happen, either in the form of total refusal or lower payments compared to other students. It can be seen as unlikely, however, that students will go to court against their parents to gain funding, implying that these disadvantaged students are made worse off by the system. In addition, while it is undeniable that Bafög enables a share of students to study in the first place, the results of the survey imply that Bafög, if received, is often not enough, presenting a systemic disadvantage for these students. Lastly, fair equality of opportunity seems inadequate too, as many students struggle to access and maintain financial support. Bad and complicated accessibility of Bafög can be argued to lead to stress during studies, leading to students having to put a lot more effort into financing their studies than others. In addition, especially the Bafög students experiencing financial difficulties argue that they are often pushed into work to cover their living costs. This supports Behr and Theune's (2016) analysis that students from economically weaker backgrounds are often pushed into work during their education, leading to worse grades than their peers and even delayed entry into the labour market. To summarise, the criteria of Rawls' theory of distributive justice are not fulfilled, as there are inequalities present that do not benefit the least advantaged. While the redistributive base of the student aid system in Germany might have the goal of making educational access fairer, the practical execution is not beneficial to overall equality. This is also reflected in the empirical literature, with Steiner and Wrohlich (2012) finding only a small positive relation between Bafög and enrollment numbers. It can be argued that while there might be an initial small increase in equality, this does not suffice for an egalitarian student aid system.

The Swedish universal student aid system, on the other hand, meets the criteria of distributive justice. Fulfilling the necessary 'Equal Basic Liberties', a high level of independence in line with Esping-Andersen's (1990) typology for the socio-democratic welfare states are found to free up decisions to pursue tertiary education as wanted, independent of socioeconomic and

parental background. The responses supported that due to its universal nature, CSN comfortably covers the living costs of the students. Both the adequate coverage of living standards and good repayment conditions expressed by the students, therefore, do not align with Avdic and Gartell's (2011; 2015) aforementioned findings of students from economically weaker backgrounds being pushed into work. This, however, might well be due to the time that has passed since the reform, giving students time to adjust to the new conditions. The Swedish system is also found to fulfil the criteria of fair equality of opportunity. The easy accessibility of CSN and reliable flows of student finance facilitates equality of opportunity when pursuing their degrees, due to less stress and the ability to focus on their studies. Therefore, the Swedish student aid system fulfils all criteria of distributive justice, implying that the student aid system is egalitarian. It is supporting Esping-Anderson's (1990) observation that social welfare aims to give everyone the chance to participate in society at the same level as economically endowed individuals.

7.2 Comparative Implications

Throughout this study, the partaking students' insights were able to highlight perceived problems and benefits that either imply a lower or a higher level of inequality within the student aid systems. Sweden emerges as the nation that achieves to fulfil the Rawlsian criteria for distributive justice. CSN as a universal system is, therefore, better at promoting equality than the German system of parental funding and Bafög. These insights also reflect Gwosć and van der Beek's (2022) findings that students in countries with the supply principle have fewer students in serious financial difficulties than in those following the welfare principle. The equalising effect of the German system is insufficient to fulfil the criteria of distributive justice, by for instance, adding many stress factors for students in financial difficulties compared to those who receive reliable funding from their parents. In addition, the bureaucracy of Bafög can be interpreted as a further deadweight loss to the German egalitarian case.

It has to be acknowledged that the underlying welfare state system impacts the initial formation of the student finance system and to some extent also dictates how the systems are structured. Yet, to achieve fairer access to education, nations should not limit themselves to their systemic base but take the opportunity to learn from different systems. Therefore, while

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it is unrealistic that the German system completely adapts to the Swedish system, it is reasonable to take the Swedish system as an example to improve towards. While the Bafög reform of 2001 only led to minor increases in enrollment (Baumgartner and Steiner, 2006), it is reasonable to believe that a more substantial increase in eligibility could guarantee financial security and independence and, therefore, lead to a more egalitarian student aid system. Furthermore, following Glocker's (2011) argument, this could reduce dropouts from university education. One first step to improve the accessibility of Bafög could be the simplification of the means test and also increasing the digitalisation of the process similar to the Swedish system.

8. Conclusion

Education is arguably one of the most important remedies to prevent income inequalities from increasing across Europe. Among others, it allows students to gain skills necessary to access high-income jobs. This shows the importance for our welfare state systems to make it accessible at all levels, including university education. Student financial aid is one of the ways it can be facilitated but the approaches to it vary across countries. Therefore, this research contrasted two different structures, the universal Swedish CSN and the needs-based German Bafög, to investigate which facilitates more economic equality. To gain representative insight, tertiary students in Germany and Sweden were surveyed for their perception of their own system. A comparative case study of the results was then conducted, based on Rawlsian distributive justice as a theoretical framework to control for equality or inequality. The findings revealed that the Swedish universal system provided a high level of equality in line with the theoretical framework. With high consensus, the students perceived that CSN facilitated their independent decision to study, increased overall equality and maintained fair equality of opportunity. The German needs-based system, in contrast, did not fulfil the criteria of distributive justice. While students generally supported the needs-base of Bafög, they voiced that the reality of the system was in large parts dysfunctional. From funding insecurities to bad accessibility, the German system was found to not promote equality in educational access.

The survey findings in line with the literature imply that student finance systems following the universal principle are better at promoting equality than the needs-based system. To

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promote higher economic equality in Germany too, it is therefore recommended to adapt the system more towards an inclusive structure like in Sweden. This could be done by, for instance, increasing general eligibility and simplifying the means test.

Overall, this research was able to give valuable insights into the comparative equality of the student aid systems and contribute to the Swedish student aid literature, as well as the comparative literature between Sweden and Germany. Yet, several limitations have to be acknowledged: first, as mentioned in the survey limitations (5.2.1), this research cannot be taken as a holistic assessment of the equality of the student aid system as it does not account for the equality of the funding system via taxation. Second, it focuses on current tertiary students, however, not on students who were prevented from studying at university due to socioeconomic inequalities. Lastly, due to the limited scope of this research, the analysis attempted to focus on the main aspects of the theoretical framework through deductive coding. This implies that not all insights gained from the survey could be used.

Nonetheless, it was able to give first qualitative insights into the underexplored field of student finance and distributive justice. It gives a basis for further research on the comparative equality of universal and needs-based student aid systems. To confirm and extend the findings of this thesis, large-scale quantitative studies might further validate these findings. In combination with this study, it could prove a scientific base to adapt student aid systems across Europe to the most egalitarian system possible. This could allow many more disadvantaged students to study without barriers.

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Appendix A

The following content includes the respective survey questionnaires for each country group. As the introduction text and the demographic / socioeconomic data questions are mostly identical, they will only be listed once. For the remaining questions, they are first listed for Sweden and then for Germany. For the survey, the German questionnaire included the questions in both German and English. This section will only include the English formulations.

A1 Survey Questions: Introduction and Population Characteristics

A1.1 Introductory Text

This survey aims to explore students' perception of the equality of the financial student aid system (CSN) in Sweden / in Germany. It is conducted by Julia Hampel for the EOSEK12 bachelor thesis of the BSc in Economy and Society at Lund University. The data is collected anonymously and is used only for the aforementioned bachelor thesis. The data can be accessed by the thesis supervisor, thesis course convener and thesis examiner for grading purposes. Participation in this study is voluntary and the survey participation can be terminated at any point. As the data is collected anonymously, personal data will not be identifiable after the completion of the survey. All information given will only be used for scientific purposes. For further questions regarding this survey, do not hesitate to email Julia Hampel at ju3224ha-s@student.lu.se

I consent to o	
Age	23-25 26-30
0	Prefer not to say
Gender	
0	
0	Male

A1.2 Survey Population	Characteristics
------------------------	-----------------

0	Other
0	Prefer not to say
0	
Are you curre	ently enrolled in higher education (university, högskola,)?
0	No
0	Yes, in my bachelor's programme (kandidat)
0	Yes, in my master's programme
0	Yes, as a doctoral student
0	Other
In which depa	artment do you study?
0	Economics and Business
0	Social Sciences
0	Law
0	Engineering
0	Natural Sciences
0	Computer Sciences
0	Medicine
0	Humanities
0	Other
In which seme	ester are you currently (of your respective degree)?
0	Choice between semester 1 to 10

Financing Your Studies	
1	 How do you finance your studies? Multiple answers are possible Parental income Work Student Financing Savings Other
2	What is the amount of your monthly total income or allowance in SEK / Euro (yearly average)? ⁹

⁹ The author acknowledges that the currencies do not weigh an exact 1 to 10 exchange rate and that this, in combination with differences in living costs in each country, might not allow for absolute comparability of the income numbers given. This comparison, however, was mostly aimed to gain an approximate insight into the incomes of the students.

3	Do you feel like your monthly allowance is sufficient to cover your monthly expenses?
	• Yes
	○ No
	• Most of the time

A2 Survey Questions CSN

Opini	on on the Student Finance System (CSN)	
system	This section is asking for your personal perception and opinion on the financial student aid system in Sweden. Most questions can be answered irrespective if you receive student aid or not (unless specified). Feel free to elaborate on the open-ended Questions	
4	 Are you relying on student financing to cover your monthly expenses? Yes In large parts, but I receive other income (parents, work, savings) I completely rely on other income (parents, work, savings) 	
5	 Are you eligible for financial student aid in Sweden (CSN)? Yes, and I take it. Yes, but I decided against taking it completely. Yes but I only take the grant part. No I don't know. Other 	
6	What do you see as the major strengths of the current student financing system (CSN)?	
7	What do you see as the major weaknesses of the current student financing system (CSN)?	
8	If you ever applied, how do you experience applying for student funding? Is it easy? Is it difficult? How long does it take you? Did you experience any obstacles in the process?	
9	Did you ever have worries that your student financing would be withdrawn? Elaborate if no or yes, and for whatever reason that might have been.	
10	Do you feel like it is fair that the current system is available to (almost) all students?	
11	In Germany, the student aid is only available to students from weaker financial backgrounds. Do you think this would be a fairer or unfairer system if established in Sweden?	

12	Did the student aid system make your initial decision to study at university or a högskola easier?
13	Would you have considered to work or do an apprenticeship if it would not have been in place instead?
14	Do you feel like the current system makes your studies more or less stressful?
15	If you receive CSN (especially the loan part), do you have any worries regarding future debt? If yes, which? If no, why is that so?
16	Is there anything you want to mention that relates to CSN or the financing of your studies?

A3 Survey Questions Bafög

Opini	Opinion on the Student Finance System (Bafög)	
systen answe	This section is asking for your personal perception and opinion on the financial student aid system in Germany (i.e. financing by parental income or Bafög). Most questions can be answered irrespective if you receive student aid or not (unless specified). Feel free to elaborate on the open-ended Questions.	
4	 Are you relying on student financing to cover your monthly expenses? Yes In large parts, but I receive other income (parents, work, savings) I completely rely on other income (parents, work, savings) 	
5	 Are you eligible for financial student aid (Bafög)? Yes, and I am taking it. Yes, but I deliberately do not take it. No. I don't know. Other 	
6	What do you see as the major strengths of the current student financing system?	
7	What do you see as the major weaknesses of the current student financing system (Bafög)?	
8	If you ever applied for Bafög, how do you experience applying for student funding? Is it easy? Is it difficult? How long does it take you? Did you experience any obstacles in the process?	
9	If you receive Bafög: Did you ever have worries that your student financing would be withdrawn? Elaborate if no or yes, and for whatever reason that might have been.	

10	If you do not receive Bafög: Do you feel like you would benefit from receiving student aid? Would you be able to cover your living expenses better?
11	Do you feel like the current system (Bafög) and its limitation to students from economically weaker students is fair? Or should more students receive Bafög?
12	All Swedish university students have the right to financial student aid, independent of their parental income. What would you think if this system exists in Germany? Would it be fairer or unfairer?
13	Did the student aid system make your initial decision to study at university or similar institutions easier or did you initially consider doing something other than studying due to financial reasons?
14	Do you feel like the current system (of parental income support and / or Bafög) makes your studies more or less stressful?
15	If you receive Bafög, do you have any worries regarding future debt? If yes, which? If no, why is that so?
16	Is there anything you want to mention that relates to Bafög or the financing of your studies?