UCAS response to the 'Securing student success: risk-based regulation for teaching excellence, social mobility, and informed choice in higher education' consultation

UCAS is an independent charity providing information, advice, and admissions services to inspire and facilitate educational progression. We are best known for running undergraduate admissions services for around 400 universities and colleges. In 2017, we handled nearly three million applications for full-time undergraduate programmes, from 700,000 students.

We aim to be a trusted choice for high quality information and advice about options for progression. Our information and advice services support young people making choices post-16, as well as people of all ages interested in undergraduate and postgraduate courses, including teacher training and, increasingly, apprenticeships.

Our position at the nexus between secondary, further, and higher education (HE), means that students, on whose behalf the Office for Students (OfS) will regulate, and providers, who will be subject to its regulation, represent UCAS' key customer groups. As such, we are responding to this consultation based on the interests of UCAS' student and provider customer base.

Student choice and information (p.53 – 59)

Our strategy puts the student journey at its heart, and focuses on providing timely, accurate information and advice to students and those who support them – particularly teachers, and parents or guardians – to enable well informed decision-making.

UCAS is committed to ensuring students have access to information which will help them make informed choices about what and how to study, where to apply, and to manage their application choices and outcomes. We wholly agree with the assertion that 'the ability of students to make informed choices is critical, both for the individual and to shape the sector for the benefit of future students'.

Amid the plentiful sources of information and advice, students view UCAS as a trusted and impartial provider. We receive around 20 million users to our website every year, and our 2017 new applicant survey found that 83% were either extremely or mostly happy with 'the level of information provided on ucas.com about going to, or applying to, university or college.'

UCAS' unique insight into the student decision-making process, coupled with our CRM capability, has enabled us to develop a tailored communications and information journey. This ensures every student who engages with UCAS receives increasingly personalised information, at the right time, to enable them to make informed decisions. Content is dependent on, for example, the event a student is attending, the subject they are interested in, and the links they have clicked, all of which personalise their experience.

We offer students a multi-channel experience to present information, with a growing social media presence and use of case studies, blogs, vlogs, and storytelling. We would be keen to

both share our expertise with the OfS to inform its student information provision strategy, and explore avenues for collaboration where appropriate.

In support of widening participation, we offer targeted information and advice for those students who are typically underrepresented in HE, such as disabled students, care leavers, young carers, or those with parental responsibility, and estranged students. This content, developed in conjunction with relevant support groups and charities, includes step-by-step guides, FAQs, timelines, and checklists to address misconceptions, inspire ambition, and support informed decision-making.

UCAS is a leading search provider for HE courses and, this year, we released our new multi-destination search tool, which allows students, teachers, and advisers to find undergraduate, postgraduate, and conservatoire courses in one location. The tool also includes links to the relevant key information statistics for each course, and information about providers' TEF ratings. Since the beta launch in June 2016, over 1.5 million users have viewed nearly 50 million pages, and performed nearly three million searches. We continue to work with our customers to expand its functionality, with the ambition to allow students to filter by outcome award and entry requirements, among other things.

We will be reviewing our information and advice strategy in early 2018, and will be looking towards greater integration of data services to inform student decision-making.

Transparency Condition (A3) (p.53, p.56)

In 2016, UCAS published a set of equalities data for 130 of the UK's larger higher education providers, delivering full-time, undergraduate provision, to address questions about transparency in admissions, and to help providers benchmark their performance and examine differences in offer and acceptance rates.

This examined differences in application, offer, and acceptance rates by sex, ethnic group, and area background (POLAR3 and SIMD quintile for providers in Scotland). Critically, UCAS' analysis places applicant numbers, and acceptance and offer rates, into context. Applicant numbers and acceptances are placed in the context of population differences, which is especially important for understanding the representation of different ethnic groups in HE. The offer rate data explains the likelihood of receiving an offer in the context of average offer rates for other applicants, with the same predicted grades, who're applying to the same course at the same university. This provides important contextualisation to facilitate accurate interpretation. This has since become an annual equalities release, with the next iteration expected in January 2018.

This release encapsulates individual provider reports and separate aggregate reports for the different UK nations, and by lower, medium, and higher tariff groups. The data is available on the UCAS website as PDF and CSV files, to allow for further exploration by higher education providers and other interested third parties. We have also produced a data explorer to allow for greater visualisation, and to facilitate easier data manipulation by all audiences.

To extend the coverage and value of UCAS' equalities release, we have recently purchased first year completion and degree outcome data from HESA. The intention is that this will be incorporated into a future release in spring 2018. This will go one step further to supporting providers with meeting the requirements set out by the Transparency Condition (A3).

The sector has welcomed the publication of the UCAS equalities release – both through understanding the expected offer rates of a particular cohort of students, and being able to benchmark themselves against other providers. A number of providers have used the data to conduct self-assessments of their practices, and identify areas where further investigation may be required.

At present, this opt-in service is limited to 130 larger providers due to concerns about data protection issues at smaller providers. We are, however, exploring how we can support smaller UCAS customers, including conservatoires, with the provision of equalities data, recognising they may not have the resource or expertise to produce such data in-house.

As stated above, UCAS currently offers this service to UCAS customers delivering full-time, undergraduate provision. We would be open to discussing with the OfS, and HESA, how we could work together to support and integrate part-time and postgraduate provision, as well as non-UCAS customers.

However, the consultation emphasises the need for providers to publish this data for students. To date, UCAS has chosen not to present the equalities data release in a student-facing format due to its complexity, and the risk that doing so may have unintended consequences of discouraging the very students providers want to attract. This concern was recently reiterated by our Board and advisory Council, and we strongly encourage that guidance to providers about how to publish this information states the desirability of publishing contextual information – for example, information about the activities providers are undertaking to attract and retain certain groups of students. We would be keen to work with the OfS, UCAS' customers (students, advisers, and providers), and sector stakeholders to help appropriately position this data alongside relevant and comprehensive information and advice.

The Teaching Excellence and Student Outcomes Framework (TEF) (p.53 – 55)

We are committed to inspiring and supporting students to choose the progression pathway that is right for them, whether that involves HE at age 18 or not. For those who choose to progress to HE, we understand the factors that influence decisions about which courses and providers to apply to, and which offers they accept, and recognise these are based on multiple factors.

We aim to provide the information students tell us they need, and to give them the tools to explore and find answers to the many questions they have. This includes information about the course – including duration, core modules, and accreditation – as well as that relating to the provider, for example, location, cost, facilities, and accommodation. A provider's TEF rating is an additional piece of information students and advisers may wish to take into account.

Given the complexities of the TEF, UCAS undertook an extensive engagement plan with customers and stakeholders alike to inform its approach to publishing TEF ratings in its search tool. This included webinars and conferences for providers, teachers, and advisers, as well as student focus groups. The consensus was that the TEF ratings need to be accompanied by comprehensive information and advice to promote understanding of the complexities and voluntary nature of the scheme.

We recognise it is proposed that from 2019/20, TEF should be a general condition for registration of English providers in the approved categories with 500 or more students, and we'll include this data in our search tool.

However, students cross borders between UK countries in significant numbers. In 2017, 10,660 English students were accepted onto courses at Welsh providers, and 4,945 at Scottish providers.[1] Therefore, it remains important for students to understand the TEF is not mandatory in other parts of the UK (i.e. that a provider located in the rest of the UK may have chosen to opt-out of the TEF and so has not received a TEF award). UCAS will continue to work with UK-wide stakeholders to ensure consistency in messaging.

The consultation document also outlines the Government's ambition to extend the TEF to subject-level 'as soon as possible', with a view to 'driving improvements in teaching, providing better information for students, and empowering choice'. Once again, we would look to engage with our UK-wide customer and stakeholder base to determine how best to integrate such ratings into our products and services.

The usefulness of the TEF in influencing student choice will ultimately be determined by outcomes. UCAS will be able to support the sector in understanding any changes in student or provider behaviour via trends in our data. Similarly, our in-house survey expertise will allow us to gain qualitative insight into use of the TEF, that we would be keen to share with policy makers.

Student transfers (p.57 – 59)

UCAS recognises the importance of student choice and promoting visibility of all opportunities, including those available to students once in HE. To this end, we support the ambition to improve the ease with which students can transfer courses.

There are many known challenges associated with student transfers. A consultation by the Department for Business, Innovation, and Skills (BIS) identified several potential barriers, including a lack of information[2]. UCAS is well positioned to address this issue, by acting as a central source of high quality information and advice for potential transfer students. Nonetheless, logistical, social, and financial barriers remain, which must be acknowledged. As such, we would welcome the opportunity to work closely with the OfS and other sector stakeholders to inform our approach, and present a balanced perspective to students.

The UCAS system already supports students who wish to transfer to a new HE provider. We enable students to input HE credits achieved into their applications, and collect information on course opportunities for students looking to access first or second year HE. However, we are actively seeking to enhance this functionality. We intend to allow students to search for opportunities based on year of entry. This is complementary to our commitment to expanding our information and advice provision.

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[1] 2017 End of Cycle Report, Patterns by geography

[2] www.gov.uk/government/uploads/system/uploads/attachment_data/file/579438/Findings_from_the_Call_for_Evidence_on_Accelerated_Courses_and_Switching_University_or_Degree.pdf

The new regulatory landscape may lend itself to higher volumes of provider and/or programme closures. In such instances of market exit, UCAS would be well placed to support students in continuing their studies, and, as we have demonstrated in the past, support students who have needed to move providers as a result of changes in the Tier 4 visa status of a provider. Moreover, UCAS will want to maintain open dialogue with the Office for Students to ensure there is joined up engagement and support where providers are facing a significant risk of failure.

The Register (p.66 – 71)

UCAS is supportive of the rationalisation of sector regulation to support student choice, and so recognises the benefits of a single gateway for all providers of higher education. Moreover, there would be efficiency benefits to be had for UCAS and other possible consumers of this data. For example, our customer onboarding process could feasibly be superseded by a cross-check against the Register.

The design of the Register would be best shaped in consultation with HE providers, however, we would suggest the inclusion of Tier 4 sponsor status as a useful addition. This information currently resides on the Home Office Register of Licensed Sponsors, and confirms whether a provider can recruit international students. Its inclusion on this single register would therefore offer significant efficiency benefits to the sector.

Conclusion

The creation of a new regulatory framework represents a notable change for the English HE sector. The creation of the OfS as a champion of student interests will promote the collective outcome of student success. UCAS' expertise in providing information, advice, and admissions services means we are ready to work alongside the OfS to help ensure all students, particularly those from disadvantaged and traditionally underrepresented backgrounds, have access to better information, and choose the HE experience that's right for them.

Our innovative approach to information and advice is long-established and, crucially, trusted by students. We will therefore be able to support providers in meeting their obligations under the Transparency Condition (A3), and students in navigating this powerful, yet complex data. Similarly, we will work with our customer base to inform our approach to implementing the next phase of the TEF, conscious of the UK-wide context. In addition, we are keen to scope how we might be able to give greater visibility to opportunities for student transfers, and welcome the Register as an efficient source of provider data.

UCAS would be willing to expand on any of the points above, and is looking forward to developing a mutually beneficial relationship with the OfS once fully established.