

UCAS response: Department for Education's higher education policy statement & reform consultation

As an independent charity, UCAS is the leading authority on student progression. Our significant role as the gateway to post-secondary opportunities allows us unparalleled insight into the shape of the HE and training landscape. UCAS' retrospective and forecasting analysis, along with commitment to releasing eight million data points each year, plays a vital role in informing the sector's understanding of student demand and behaviours. In addition, we are a student-centric organisation with unparalleled reach – ucas.com receives 30 million unique visits per year – and careers information, advice and guidance (CIAG) expertise, which includes tools such as the Careers Quiz, where outcomes and skills data support decision-making, mean that we have the capability to support the Government and sector in addressing skills gaps.

It is this insight and understanding of student mindset which underpins our response to this consultation. Our evidence is limited to those questions where our analysis and insight is most relevant and impactful – we look forward to further discussion with Government ahead of its issuing of a response.

Summary

- **The introduction of a Level 2 minimum eligibility requirement (MER) would have the greatest numerical impact on students eligible for student finance. The introduction of a MER at both Levels 2 and 3 would most impact the progression of disadvantaged students and some ethnic minorities (especially Black students).** An additional exemption for free school meal (FSM) eligibility, could mitigate against the risk of disproportionately impacting the most disadvantaged students.
- **The implementation of a MER or a student number control (SNC) will mean that some individuals are unable to progress to HE.** This is exacerbated by the upcoming 'journey to a million applicants', which will see applicant numbers grow from the current 700,000 applicants each year to one million by around 2026. In this context, **Government will need to ensure availability of, and support for, students in accessing high-quality alternative opportunities such as apprenticeships, Higher Technical Qualifications (HTQs) and modular study at Levels 4-6 – with UCAS well placed to support.**
- To encourage credit-based and more flexible provision as set out in the government's lifelong loan entitlement (LLE) ambition, **UCAS believes that mandating the allocation of credit to all Foundation Year (FY) programmes and developing a more flexible (i.e., opportunities for students to be funded on a 'bitesize' basis) Access to HE programme is necessary**, especially for adults re-entering education or training after many years in the workplace who need to refresh their literacy, numeracy, and study skills before accessing higher level courses or an apprenticeship.
- UCAS research highlights the extent to which 'pre-HE costs' can be a barrier to progression, or a barrier to aspirational choice; therefore, **the national scholarship**

scheme (NSS) should be complemented by the introduction of a ‘national progression fund’ to support students in transition to education or training. Furthermore, the adoption of the [UCAS multiple equality measure \(MEM\)](#) as the default mechanism for measuring participation within NSS would provide a more nuanced understanding of an applicant’s context.

- There is a clear need to increase parity of support options for all post-secondary pathways, including across all four UK nations, to safeguard student choice. Therefore, **UCAS agrees with the alignment of FY fees to those of Access to HE Diplomas and the provision of maintenance support for part-time HTQ students to bring greater financial parity to all pathways.**
- This diversification of the landscape **increases the need for comprehensive careers information, advice, and guidance (CIAG) to ensure students are fully supported to make the right decisions for them.** This is a key priority for UCAS, with our aim being to be entirely route neutral to ensure parity across all pathways including academic, apprenticeship, and technical routes.
- **A HTQ ‘register’ maintained by Government or one of its agencies, coupled with a requirement for all HTQ provision to be listed on [ucas.com](#)** would enhance awareness and allow for more robust analysis of uptake. A similar approach, requiring apprenticeships to be listed on *Find an Apprenticeship* and [ucas.com](#) would dramatically improve visibility of opportunities.
- In designing any student number control (SNC) policy, **UCAS advocates a data-led approach which aligns with the levelling-up agenda and supports efforts to increase participation within priority WP groups.**

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Analytical modelling

As we approach the ‘journey to a million applicants’ there are implications for the direction of education policy set by Government, student choice and obvious challenges for the sustainability of the current tertiary funding model.

Minimum Entry Requirements (MERs) for access to student finance and student number controls (SNCs) in England would achieve the aim of reducing direct public expenditure, their introduction would naturally change patterns of access. The focus of our analysis is therefore on understanding the potential for disproportionate or unintended impacts on certain groups. We also propose considerations for the implementation for both SNCs and MERs.

All modelling is England-domicile only and assumes that both student and provider behaviour remain unchanged. Although this may be the case initially, in the medium-long term, we would expect that both evolve amid any changes to the policy context – universities and colleges to grow new forms of provision and students to explore alternative pathways to study their chosen subject. This change in behaviour cannot be underestimated – it may negate the intended impact.

Modelling the impact of Student number controls (SNCs)

UCAS has chosen to model the impact of the introduction of a potential student number control at subject-level via the use of HESA’s continuation rate data. We recognise that there are many options for the introduction of a SNC, but the following analysis seeks to provide one example of how such a policy may be applied and considerations for application.

Question 4: Do you have any observations on the delivery and implementation of SNCs, including issues that would need to be addressed or unintended consequences of the policy set out in this section?

As noted above, UCAS has modelled a single form of student number controls that could be implemented to illustrate the range of considerations that should be made should such a policy be taken forward. In this example, UCAS used [HESA’s 2019/20 non-continuation rate data](#) at subject-level and applied a 6% threshold – this threshold has been chosen as it encapsulates the six subject groups with the highest non-continuation rates. A 5% reduction in 2021 acceptances has then been applied across those subject areas not meeting the threshold to illustrate the application of a SNC. The subject areas not meeting the 6% threshold are as follows:

1. Biological and sport sciences
2. Business and management
3. Communications and media
4. Creative arts and design
5. Combined and general studies
6. Computing

Key findings of the modelled scenario include:

- **Numbers entering HE fall:** all ages acceptances fall by 1.9% (-7,900), with the 18 year old entry rate falling by 1.8pp to 38.3% (-4,200).
- **The participation 'gap' at a system level remains stable and does not worsen:** acceptances fall by 1.9% for all POLAR4 quintiles inclusive of 1 (least advantaged) to 5 (most advantaged). However, a different picture emerges beyond this.
- **The regional equality picture worsens for some regions:** entry rates for South West (-1.8% to 33.5%) and East Midlands (-1.8% to 35.1%) proportionally decrease more than London (-1.7% to 50.5%).
- **The White ethnic group is more affected than the Black and Asian ethnic groups:** acceptances from the White ethnic group fall by 5,200 (-1.9%), compared to 1,100 (-1.7%) and 700 (-1.7%) for the Asian and Black ethnic groups respectively.
- **White 'working-class boys' would lose out:** Acceptances for White men from POLAR4 Q1 fall by 2.7%, compared to a fall of 2.2% for White men from POLAR4 Q5.
- **Impact is greatest for lower and medium tariff providers:** Lower and medium tariff acceptances fall by 4,200 (-2.3%) and 2,500 (-2.1%) respectively, compared to 1,200 (-1%) for higher tariff acceptances.
- **Mature age groups are more affected:** Acceptances for 19 year olds (-2.2%), 20 year olds (-2.3%), 21-24 year olds (-2%) all experience larger proportional falls than 18 year olds (-1.8%).
- **Men are more affected than women:** Male acceptances fall by 4,300 (-2.4%) and female acceptances fall by 3,600 (-1.5%).

The above is one illustrative example of how a SNC may affect patterns in access to HE. Informed by this, should a SNC be taken forward, UCAS recommends it is done so on the following basis:

- **A data-led approach:** Further analytical modelling of options to highlight potential impact and identify risks. Such modelling should also seek to understand the breadth and depth of alternative provision available for those individuals who may now miss out on accessing their HE course of choice. This modelling must also consider behavioral change resulting from such a policy, both by universities and colleges and applicants.
- **Alignment with levelling-up agenda:** Given that impact is likely to be greatest for lower and medium tariff providers, which typically recruit more local students, a SNC ought to take account of the geography of a university or college's applicant pool to not have a detrimental effect on levelling-up.
- **Support efforts to increase participation within priority groups:** Mindful of the [strategic priorities in widening access](#) as set-out by the Secretary of State, any SNC should not inhibit participation by underrepresented groups, such as White working-class boys.
- **Thorough and ongoing equalities assessment:** A thorough equality impact assessment of any policy prior to implementation with regular, annual monitoring.

Modelling the impact of Minimum Eligibility Requirements (MERs)

UCAS submitted an analysis of the impact of Level 3 MERs at a threshold of CCD and DDD to the [Augar Review](#) but has now updated its analysis to reflect the proposal outlined in the consultation; namely, a form of MER set at two Es (pass) at A level. In addition, UCAS recently undertook [a similar piece of analysis](#) at Level 2 which is expanded upon in this response via a

proposal to include an additional exemption for those applicants who are eligible for FSM. As such, our analysis is most relevant to the following two questions:

Question 5: Do you agree with the case for a minimum eligibility requirement to ensure that taxpayer-backed student finance is only available to students best equipped to enter HE?

Question 13: Are there any other exemptions to the minimum eligibility requirement that you think we should consider?

The key points from our analysis are:

- **A Level 2 MER would impact on more students:** The introduction of the proposed Level 2 MER (around 10% of applicants affected) would see more students miss the threshold, with 10% of applicants affected. By comparison, a Level 3 MER would see less than 1% affected.
- **Disadvantaged students more likely to be impacted:** In both cases, the same groups of applicants miss out; disadvantaged students, some ethnic minorities (especially Black applicants), and acceptances to lower tariff providers are more likely to not meet a MER.
- **A Level 2 MER would impact non-STEM most:** A Level 2 MER most affects non-STEM subjects, whereas impact is equitable for STEM and non-STEM subjects with a Level 3 MER.
- **Action needed to safeguard the most disadvantaged:** If MERs are going to be introduced to secure student finance, thought must be given as to how the impact on the most disadvantaged students is addressed prior to implementation. One option may be to include an additional exemption for the most disadvantaged individuals, as defined by FSM. In the case of a Level 2 MER, this would see an additional 3,040 of the most disadvantaged students now meeting the threshold.

Level 3 MERs set at two Es (pass) at A level

For this analysis, we consider England-domiciled placed applicants through UCAS during the past five years. Furthermore, the analysis is limited to students who achieved A levels - these represent 62% of all English acceptances. Two exemptions have been applied: namely, those 25 and above and 17 or under, and those holding pre-existing degree level qualifications, as a proxy for Level 4/5 achievement.

Across the five years, an average of 2,500 individuals or 0.85% of the analytical population are recorded as having achieved A level results below the designated threshold (two Es at A level). The number of accepted applicants not meeting the threshold is consistently small but has shown a degree of variation over the last five years with a notable decrease during the last two years. This is likely linked to the adoption of centre assessed grades in 2020 and teacher assessed grades in [2020](#) and [2021](#) and the increased outcomes awarded in these cycles

The following applicant groups would be less likely to achieve the MER:

- **Disadvantaged applicants are the most likely to miss the MER:** 0.86% of all POLAR4 Q1 applicants do not meet the threshold, compared to 0.41% of POLAR4 Q5 applicants.
- **Men are slightly more likely to miss the MER:** 0.77% of male applicants do not meet the MER, compared to 0.51% of female applicants.
- **Asian and Black applicants are more likely to miss the MER:** 0.99% of Asian and 0.84% of Black applicants do not meet the MER, compared to 0.53% of White applicants.

- **The impact is uneven across regions:** A higher proportion of applicants from the West Midlands and Yorkshire and the Humber (0.7% and 0.78% respectively) do not meet the MER.

In addition, the impact of this Level 3 MER would also have a differential impact across types of universities and colleges, and subjects:

- **Impact is greatest for lower tariff providers:** Those accepted into a lower tariff HEP are more likely to have below-MER attainment (0.93%), than those accepted into higher tariff HEPs (0.07%).
- **STEM subjects are not disproportionately impacted:** Similar proportions of STEM subject acceptances (0.63%) and non-STEM acceptances (0.62%) are below the MER.
- **Computer science is the most affected subject group:** Subject groups with the largest proportion of acceptances not meeting the MER are computer science (1.06%), business and administration (0.92%), education (0.88%), law (0.81%) and technologies (0.8%).

Level 2 MERs set at Grade 4 in English and Maths

For this analysis, we considered state school applicants in England who turned 18 in the 2019/2020 academic year. This covers around 85% of all England-domiciled 18 year old applicants in 2020 and around 60% of all 18 year old applicants in 2020, equating to 44% of all English applicants in 2020, and 29% of all applicants in 2020.

In 2020, 22,800 applicants or 10.3% of the analytical population are recorded as having achieved GCSE results below the designated threshold (Grade 4 or above grade in English and Maths).¹ Therefore, at sector level, the impact of the proposed Level 2 MER is greater than the proposed Level 3 MER.

The following applicant groups would be affected by the proposed MER:

- **Disadvantaged applicants are the most likely to miss the MER**, with 14.3% of applicants living in POLAR4 Q1 areas and 19.3% of those in receipt of FSM below the threshold (compared to 7.2% of POLAR Q5, and 9.9% of non-FSM).
- **Black applicants are the most likely to miss the MER** (20.1%), compared to 8.7% of White applicants, and 7.6% of Chinese applicants.
- **The impact is similar for both men and women**, with similar proportions of male (10.8%) and female (10.5%) applicants missing the threshold.
- **Black applicants are the most likely to miss the MER** (20.1%), compared to 8.7% of White applicants, and 7.6% of Chinese applicants.
- **London-domiciled applicants are the most likely to miss the MER** (13.1%), with high proportions also seen in the West Midlands (12.8%), and the North West (11.3%).
- **Applicants domiciled in the South of England are the least likely to miss the MER**, with only 8.1% of those in the South East, and 8.6% of those in the South West below the threshold.

The impact of a Level 2 MER would have a differential impact across types of universities and colleges, and subjects. Analysis of the proportion of placed applicants achieving the MER shows:

¹ See Annex B for data tables

- **Impact is greatest for lower tariff providers:** 81% of acceptances achieve these grades, relative to 90.7% at middle tariff providers and 98.2% at higher tariff providers.
- **Non-STEM subjects are hit harder than STEM subjects:** 88.4% of non-STEM acceptances achieve these grades, relative to 91.2% of STEM acceptances.
- **Impact on medicine and dentistry is minimal:** 99.6% of acceptances achieve these grades
- **Creative arts and design is one of the most affected subject groups:** 83% of acceptances achieve these grades.

Further modelling, accounting for the ‘good results at Level 3’ exemption (defined as CCC at A level) in the consultation and a potential new exemption for the most disadvantaged individuals offers the following insights²:

- Use of a **‘good results at Level 3’ exemption** drops the number of applicants below the threshold to 20,340 (from 22,800)
- An **‘FSM’ exemption** drops the number to 19,760
- A **‘MEM group 1’ exemption** drops the number to 19,870
- A **‘good results at Level 3 + FSM’ exemption** drops the number to 17,530
- A **‘good results at Level 3 + MEM group 1’ exemption** drops the number to 17,590

It is UCAS’ view that all students with the potential to thrive in HE ought to have the opportunity to do so. If MERs are going to be introduced to secure student finance, thought must be given as to how the impact on the most disadvantaged students is addressed prior to implementation (as discussed below). As per our illustrative analysis above, one option may be to include an additional exemption for the most disadvantaged individuals, as defined by MEM or FSM.

Considerations for implementation

There are several practical considerations to be considered prior to the implementation of any MER. These would likely be best covered within a further technical consultation but are worth exploring at this stage. UCAS would be willing to be part of further sector-wide discussions to enable successful implementation.

Applicants hold a variety of Level 2 and 3 qualifications

Whilst the majority of English 18 year olds hold A levels (72%), expanding to include all ages, we find that only around a half (51%) hold A levels. This means that a significant number apply with a range of Level 3 vocational qualifications including BTECs, OCR Cambridge Technicals, City and Guild’s qualifications, and CACHE, all of which currently provide important progression opportunities. Any Level 3 MER would thus need to accommodate grade-based equivalencies to enable transparency in application across the hundreds of different qualifications taken by HE applicants at Level 3, particularly mixed qualification portfolios

Among the Level 2 qualifications held by English 18 year old UCAS applicants in 2020, around 88% were GCSEs, 5% were iGCSEs, 1% were BTEC awards, with the remaining 6% being made up of other smaller qualifications. Expanding to UK applicants of all ages and domiciles, the GCSE coverage drops to around 70%, with other qualifications, such as National 5s (4%) featuring more prominently. It so follows that a full framework of agreed qualification equivalencies beyond

² See Annex C for data table

those identified within Table 1 in the consultation document will need to be published prior to the introduction of any MER at Level 2.

Mature students are more likely to present a wider range of Level 2 qualifications, including BTEC Nationals at Level 2, Functional or Key Skills, or an Intermediate Apprenticeship. The introduction of any MER will need to have specific management for non-school leavers i.e., those aged 19 – 24 inclusive (noting the proposed exemption for those aged 25+), whether this be the inclusion of broader qualifications and equivalent grades, or specific arrangements for non-school leavers. A further question relates to whether English literature or language (or both) would meet the MER. Similarly, would Core Maths, which is at the same standard and size as an AS level, offer an exemption from Grade 4 at GCSE in Maths.

UCAS recently reviewed the UCAS Tariff to encapsulate all Level 3 regulated qualifications and would be happy to share insight and qualification expertise to help inform any set equivalences that may be considered. However, the use of the Tariff for this purpose could bring with it additional complexity. For example, a MER at 16 points could be met through the achievement of two grade Es, a single grade C, or through the achievement of multiple, smaller qualifications. Therefore, should there be interest in pursuing the use of the Tariff, consideration will need to be given to the composition of contributing qualifications.

Support for those no longer eligible for student finance

The introduction of a MER will mean that there will be a group of students that are unable to progress to HE, and this may occur late in their journey – up to 20,000 students each year apply with a pending GCSE. Specific care and attention must be given to these groups to ensure they have access to high quality support and opportunities available to them at that point, whether that be an apprenticeship, HTQ or employment. UCAS, along with partners, is well placed to support these groups with our extensive CIAG offer and presentation of the full-range of post-secondary opportunities in a single location, along with our trusted brand and strong relationships with schools and colleges to ensure that these students are not left behind. Furthermore, it is a risk that there will be a small number of instances where a student begins their course without meeting the MER through human error. In these circumstances, UCAS believes the student should be allowed to continue with their studies, and work with the university or college to meet the necessary MER.

The process of introducing a MER and verification of Level 2 achievement

Several practical questions will need to be answered to accommodate the introduction of a MER. For example, what does the process of verification and approval look like? It is UCAS' recommendation that the most practical basis for achieving this would be through validation by the individual university or college using verified data from UCAS including Level 2 achievement.

At present, UCAS partners with the main UK awarding bodies to verify Level 3 achievement on behalf of universities and colleges via its results service. This allows for the smooth running of the admissions process, significantly reducing the burden on both students and universities and colleges. Our current service does not include Level 2 qualifications. This means that when a university or college seeks to verify the Level 2 achievement of a student, they will ask the student to provide a copy of this prior to, or during, enrolment. In a small number of cases, it

may become apparent at this point the student does not have the expected qualifications and/or level of attainment.

The introduction of an MER at Level 2 would significantly heighten the need for verified Level 2 achievements for both universities and colleges and the SLC. UCAS is currently working with the SLC to explore how we might facilitate better applicant and course data flows to enable the successful introduction of the lifelong loan entitlement (LLE). The scope of this could be built-upon to include data about verified attainment at Level 2 (should this be required). Note that such an arrangement would depend upon the awarding bodies' ability to expand our existing agreements and processes to include Level 2 qualifications.

Age classification

UCAS supports the proposed exemption for students aged 25+³; however, further clarification would be needed as to when this would apply i.e., point of application, enrolment or for receipt of student finance. It is also the case that in creating an age-related exemption, there is the potential for individuals to delay their journey into HE to safeguard access to student finance, regardless of what is right for the individual.

Grade outcomes in 2020 and 2021 at Levels 2 and 3 were higher than in previous years

Two consecutive years of increased outcomes at GCSE and A level will introduce cohort variability in the impact of any MER. Consequently, any MER may need to be flexed to reflect the average attainment of the cohort at national level. There is also the potential for this overall uplift in attainment at Levels 2 and 3 to increase demand for university and college as more, higher qualified individuals progress through their education. This is at a point when the 18 year old population is also increasing – by 2026, UCAS is forecasting one million undergraduate applicants, with 430,000 UK 18 year olds.

Additional considerations for the potential introduction of MERs and/or SNCs

The journey to a million applicants

UCAS projects the 2026 cycle could see one million applicants – around 27% more than in 2021, and double those seen in 2006. About 55% of this increase will be attributable to a growth in demand from UK 18-year-olds (driven by both an increase in application rates and an increase in the population) with the remaining 45% driven by continued growth in UK mature (c.10%) and international (c.35%) demand. This upcoming growth in demand will only exacerbate the challenges outlined in relation to both a SNC and MER, along with the challenge in maintaining the supply of high-quality post-secondary opportunities.

This is not only relevant for full-time HE provision, but also for apprenticeships, with UCAS noting that apprenticeships will also need to expand to meet demand. UCAS notes that just 3,600 apprentices (aged 19 or younger) started a higher or degree level apprenticeship in 2020 – 21.4 And yet, of the 750,000 people who have set up their pre-application UCAS account ready for next year, 342,000 said they are interested in an apprenticeship.

³ Note that the UK HE sector defines mature students as aged 21 and above, as defined by [HESA](#)

⁴ [Department for Education: Academic Year 2020/21 Apprenticeships and traineeships](#)

So, whilst the policy direction is clear – to direct more individuals towards high-quality technical options such as HTQs and apprenticeships, as well as modular study, with challenges in the supply of apprenticeships, and demand only set to rise over the next five years, any policy that limits access to HE options ought to be addressed with caution.

Interactions between any SNC and MER policy

Whilst UCAS modelling to date has considered the impact of SNCs and MERs in isolation, there is a scenario whereby elements of both policies are implemented. In such an event, it may be that affects are compounded, which could result in unintended consequences e.g., with fewer places available **and** fewer eligible applicants, parts of the sector may contract, limiting choice and diversity of opportunity for students.

However, the above assumes that both student and provider behaviour remain unchanged. Although this may be the case initially, in the medium-long term, we would expect that both evolve – universities and colleges to grow new forms of provision and students to explore alternative pathways to study their chosen subject.

Links with the access and participation ‘reboot’

As discussed above, disadvantaged students would initially be most likely to not meet a MER. However, there is the opportunity for their introduction to act as a further incentive for universities and colleges to improve outcomes for disadvantaged children by driving up education standards in schools and colleges in the local community. This would see the impact lessened, as more individuals meet the grade requirements of any thresholds. As such, the access and participation plan (APP) [‘reboot’](#) could act as the key bridge across initiatives – this linkage should be made explicit within any further policy consultations and APP guidance.

Timing of introduction

Should SNCs or MERs be introduced, timing for implementation will be critical to ensure that admissions processes can operate fairly and transparently. For example, universities and colleges would need to understand any limitations on their potential recruitment before the start of the cycle i.e., a year in advance of the affected intake. Depending on the nature of any restriction, systems development would also likely need to be considered, e.g., background data analysis and matching work to be able to identify and manage individuals at each stage of the cycle. This is likely to have a considerable lead-in time – further consultation with the sector and technology vendors would be essential.

Cross-border implications

One of the benefits of the UK HE landscape, predicated on student choice, is that it enables fluid cross border flows – tens of thousands of individuals each year decide to study in a different UK country, outside of their home nation. In 2021, 33,260 applicants were placed at a provider in another UK country, different to their place of domicile. It so follows that the introduction of a SNC or MER as a feature of the English HE system, must explore the impact on the UK market, for example:

- Scotland: With restrictions on numbers of home-domiciled students already in place in Scotland, would the policy lead to a limit on the number of English students who could access certain opportunities in Scotland? How would this impact on the make-up of Scottish universities and colleges?
- Wales: With limits in England, will English students be in direct competition with Welsh students for (presumably) unrestricted access to HE in Wales?
- Northern Ireland: With challenges in the supply of HE places in Northern Ireland, are Northern Irish domiciled students less likely to be able to access opportunities in England?

Importance of first-class careers, information, advice and guidance and UCAS' role

One unintended consequence borne out of the introduction of a SNC/MER policy is that lesser supported students are less able to navigate the system and, as a result, lose out.

UCAS already plays a central role as the most cited source for information for the 1.4 million individuals researching their post-secondary options. With 92% of students using ucas.com for guidance, we are investing millions in independent, engaging information, advice, and guidance. Our objective is to evolve UCAS into a leading discovery brand, positioning ourselves as 'route neutral' to ensure parity across all pathways, including academic and technical routes.

In the event of SNCs or MERs being introduced, we would want to work with the sector, Government, and partners, to ensure that our CIAG offering ensures students can make the right choices for them.

We know, for example, there is evidence that a focused number of initial choices are beneficial – students are most likely to say that they are committed to two choices (31%) followed by three choices (25%). Given that less than a fifth (19%) of students are happy to go to all five choices, in a world where places are restricted through a SNC or alternative mechanism, making sure these decisions are taken with high-quality careers advice is critical.

In addition, we are committed to working with school pupils from a younger age, engaging with those aged 13+ to inform and influence their decision-making, right from the start. In the event that MERs are applied at Level 2 i.e., aged 16, such early engagement would be ever more critical.

Similarly, whilst [UCAS knows](#) that almost half of UCAS registrants have expressed an interest in apprenticeships, one in three students report receiving no information about apprenticeships from their school or college. Moreover, [recent research from UCAS](#) showed that the word 'prestigious' was associated with university degrees by 76% of those polled compared to just 4% for apprenticeships. Where more students follow alternative pathways, such as apprenticeships, UCAS will act as a 'digital Baker Clause', providing careers information and advice for the full range of choices.

Foundation Years

Question 15: What would the opportunities and challenges be of reducing the fee charged for most foundation years, and of alignment with Access to HE fees?

The role of Foundation Years

UCAS [Progression Pathways 2017 research](#) noted the growth in volume and breadth of foundation years in recent years. Foundation years, or degrees with foundation years, are now offered by nearly 80 universities in England through UCAS, covering higher, medium, and lower Tariff providers as well as the full range of subjects.

In some subject areas, their purpose is well-understood e.g., art and design where the qualification allows students to experience specialisation to prepare them for a degree course. The concept is also well established in medicine. Currently, 27 universities in England offer foundation years specifically linked to medical degrees through UCAS; these give students the opportunity to plug gaps in their prior learning before embarking on a medical degree.

Notable challenges discussed further within the research are as follows:

- **Recognition and Progression:** Universities and colleges are not obliged to accept Foundation Years from other providers, either if they offer them themselves and/or accept Access to HE Diplomas. This means that students can inadvertently limit choice at a later stage.
- **Credit:** Not all Foundation Years are credit bearing – this means that HESA does not routinely collect outcomes data about such provision. Equally, these students are not tracked through as part of other evaluation activities, such as the National Student Survey or Graduate Outcomes Survey. This limits evaluation activities, making it harder to judge success at sector, provider, and subject levels.
- **Cost:** As commented on within the Independent Panel’s [report](#) and consultation document, the fees charged for Foundation Year provision often amounts to an additional year of student debt; whilst lower cost options such as AHDs do exist and can provide similar progression routes.

More recent research published by UCAS, [Where Next? What influences the choices school pupils make?](#) makes the case for the use of targeted Foundation Year programmes for students whose circumstances have prevented them from reaching their full potential. In such cases, these courses provide benefits in getting students back on track where they might have inadvertently closed a door to their preferred pathway. For example, the University of [Cambridge Foundation Year](#) will accept a wider range of qualifications for entry, including relevant vocational qualifications, with the offer level expressed in UCAS Tariff points rather than grades, to ensure flexibility.

Foundation Years and Access to HE Diplomas (AHDs)

Foundation Years undoubtedly share common characteristics with, and can be alternative options to, the Access to HE Diploma (AHD), also available in England. In 2021, 23,725 applicants with AHDs were accepted onto HE courses through UCAS.

The 2017 [research](#) highlighted the relative benefits of Foundation Years for allowing individuals to settle into student life, make friends, become familiar with the area, and assimilate into the university’s ethos and structure, as well as boosting their attainment prior to degree study. Nonetheless, it does highlight that the often-lower fees charged can make AHD provision a

better choice for some individuals, particularly a more mature audience who are more sensitive to the cost implications of further study. Equally, students taking AHDs (over the age of 19) can access Advanced Learning Loans to cover tuition fees with successful students having any outstanding debt written off upon completion of a subsequent degree, minimising additional debt. Finally, AHDs carry academic credit, enhancing transferability and ensuring students keep their options open.

In the context of the incentivisation of credit-based provision as detailed within the LLE consultation, UCAS believes that mandating the allocation of credit to all Foundation Year (FY) programmes and developing a more flexible (i.e., opportunities for students to be funded on a 'bitesize' basis) Access to HE Diploma programme would support the creation of a flexible skills system. Similarly, limiting tuition fee levels to those associated with AHD programmes, brings greater financial parity to the two pathways, making it easier for students to choose the right study option for them.

Critically, prospective students, and those advising them to need to have awareness of all pathways and their features. This is where UCAS' role as a partner in delivering first-class CIAG – as outlined above – is important. Our commitment is to ensure that individuals and their advisers are aware of the different features of all post-secondary opportunities, showcasing the respective benefits of FYs and AHDs, and facilitating side-by-side comparison through our search tool and the UCAS Hub.

National scholarship scheme (NSS)

Question 18: What are your views on how the eligibility for a national scholarship scheme should be set?

As a charity, supporting disadvantaged students to progress to their next step in education and training is at the heart of UCAS' purpose. We therefore welcome the pledge to introduce a national scholarship scheme to support young people from disadvantaged backgrounds to achieve their dreams, whether that it is at university or college or on an apprenticeship.

UCAS recommends the adoption of the [UCAS Multiple Equality Measure \(MEM\)](#) as the default mechanism for measuring participation, providing a true sense of progress. The measure is well-understood by the HE sector and increasingly referenced in third party publications⁵; therefore, the adoption of MEM to determine eligibility for the national scholarship scheme has significant benefits in consistency of approach. It would also ensure that this support reaches those most under-represented individuals and, through UCAS' tracking services, enable longitudinal evaluation of impact.

⁵ <https://www.suttontrust.com/wp-content/uploads/2021/05/Measuring-Disadvantage-Report.pdf>
<https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/contextual-admissions/resources/>
<https://blogs.lse.ac.uk/politicsandpolicy/a-level-results-in-context/>
<https://www.centreforsocialjustice.org.uk/wp-content/uploads/2020/02/CSJ7688-Access-to-University-WEB-3.pdf>
https://reform.uk/sites/default/files/2019-11/Access%20for%20all%20-%202019_0.pdf
<https://www.hepi.ac.uk/2020/12/16/the-uks-first-professor-of-social-mobility-lee-elliott-major-considers-the-policy-consequences-of-the-new-higher-education-admissions-data/>

The UCAS Outreach Connection Service as a vehicle for delivering the national scholarship scheme

Significant progress has been made in widening access and participation since the turn of the millennium, with 30,000 more students from the most disadvantaged areas applying in 2021 compared to 2006, with those students now twice as likely to progress to HE.

Despite a decade of progress in WP, headway has slowed in more recent years, with the MEM equality gap narrowing by an average of 1.1% year on year since 2015 versus 4.4% across the previous five years. In fact, in 2021, the MEM gap widened for the first time in a decade.

As we approach a million applicants in 2026, there are real risks to the progress made in widening access and participation, as the increase in competition risks disadvantaged students losing out. It is in this context, along with the [reboot of universities access and participation plans](#), that UCAS has launched a new Fair Access Programme, building on the extensive work already underway both across the sector and by UCAS.

A major initiative arising from the Fair Access Programme is a new Outreach Connection Service on [ucas.com](#), designed to make it easier for schools and students to navigate and connect to the range of support available from universities and third-sector charities. This service will significantly enhance understanding of how students engage with outreach opportunities and then progress, transforming the sector's approach to evaluation, with the first iteration of this expected in 2023.

UCAS will be working with Government and partners to ensure that the NSS is integrated into UCAS' new Outreach Connection Service, alongside relevant eligibility criteria e.g., the MEM – this would raise awareness and build the evidence base around its impact.

Another tranche of the Fair Access Programme's work involves UCAS working directly with the lowest progression schools and colleges across the UK, delivering bespoke continuing professional development and resources. UCAS will want to work with the Government to promote the NSS through this project so that it reaches those students who are most in need of support.

Finally, for 2023 entry, UCAS has added a range of new questions to the application related to disadvantaged and under-represented student cohorts. For the first time cohorts such as, carers, estranged students, parents, service children, veterans and more will be able to flag their circumstances in the UCAS application, as part of our end-to-end support offer for these groups. Not only does this significantly enhance the visibility of these students, but in the future will offer significant fresh insight into how these students progress to higher education, and how we can support them further.

Expanding the scope of the NSS to include support in transition

While much of the discussion regarding the potential financial barriers to HE relate to costs once enrolled, students incur a diversity of costs throughout their entire journey to university or college. It is UCAS' view that the transition into HE is a phase in the student journey that is often overlooked. Usually, student finance or other financial support (e.g. bursaries and grants) are

paid at the start of the academic term, and do not cover costs associated with deciding what to study, where, and preparing for this.

Previous UCAS research, [Through the lens of students: how perceptions of higher education influence applicants' choices](#), has suggested that it is up front and immediate costs that are of greater concern to students, as opposed to overall tuition fee costs. More recent research analysed students' views as to these 'pre-HE' costs. A survey of c.2,000 applicants found that 61% of individuals were worried that they would struggle to afford the costs incurred prior to university or college. Those costs most frequently cited are course-related materials such as laptops, books etc., accommodation deposits, travel costs to/from the university or college prior to the start of term and personal items e.g., bedding, kitchen equipment. When asked about their expectations as to likely spend during this period, respondents advised that their typical budget for pre-HE costs is between £2,000 and £3,000. In addition, 62% of students responding to UCAS' 2021 placed applicants survey said that the cost of living at university or college was one of the biggest barriers to entering higher education

So, whilst UCAS agrees that 'reforming how students access higher education is not enough on its own,' it is also insufficient to focus additional funding solely on that activity occurs once students arrive on campus. Therefore, UCAS recommends that the NSS should be complemented by the introduction of a 'national progression fund' so support students in transition. It is these costs that are more likely to be a barrier to progression, or a barrier to aspirational choice. This could be delivered directly to students via a voucher scheme or as an addition to the [16-19 Bursary Fund](#).

Level 4 and 5 courses – Higher Technical Qualifications (HTQs)

Student sensitivities to price

Question 23: Which learner types are more or less price-sensitive and what drives this behaviour?

As per UCAS' original evidence to the Independent Panel, the current funding model, and perceptions about accumulated debt, incentivise young people with an interest in HE to apply at age 18. Market dynamics (following the removal of number controls) coupled with a declining 18 year old population also incentivised providers to recruit growing numbers of young, full-time students. These factors have naturally suppressed demand from older age groups (notwithstanding [recent growth](#) linked to economic recession post-COVID), and the accompanying collapse in demand for part-time provision is well-documented.

As many mature students may have family responsibilities and financial commitments, they are likely to be much more attuned to whether further study is value for money and have questions about the whole support package a university or college offers in terms of accessibility to campus, facilities, and teaching staff, as well as additional support with finances.

Therefore, older students are more sensitive to changes in the availability of financial support – as evidenced by the dramatic falls in demand from English students for full-time undergraduate nursing programmes in 2017 (-23% at End of Cycle) and following the change from bursary to

loan funding for tuition fees. This is further highlighted by recent surveys of UCAS applicants, whereby we can compare trends in sentiment for 18 year olds relative to those 25 and over.

We asked 2021 cycle applicants how important certain factors were when deciding which universities or colleges to apply to:

- 65% of applicants aged 25+ rated the cost of tuition fees at the university or college as 'very important' or 'important', compared to 52% of 18 year old applicants. This is backed up by our 2021 cycle placed applicant survey, which asked respondents about what they felt were some of the biggest barriers when going to university or college - mature students were more likely to select the cost of tuition fees than younger students (45% of placed applicants aged 25+ selected this option, compared to 40% of 18 year old placed applicants).
- 62% of applicants aged 25+ rated the incentives on offer from the university or college (e.g., bursaries, cash rewards, vouchers for laptops) as very important or important, compared to 50% of applicants aged 18.
- 75% of 2021 cycle applicants aged 25+ rated what financial support would be available to them if they were affected by the pandemic as 'very important' or 'important.' 69% of 18 year olds rated this factor as 'very important' or 'important.'
- Mature applicants were more likely to rate the cost of travelling between their home and the uni as important, with 77% of applicants aged 25 and over rating it as very important or important, compared to 57% of 18 year old applicants.

We asked 2021 cycle applicants how important certain lifestyle factors were when deciding which universities or colleges to apply to:

- 18 year old applicants were more likely to rate the cost of living at the university or college as 'very important' or 'important', with 73% of 18 year old applicants giving the factor this rating compared to 42% of applicants aged 25 and over.
- This is backed-up by our 2021 cycle placed applicant survey, wherein younger students were more likely to select that the cost of living at university or college was a barrier (64% of 18 year old placed applicants compared to just 46% of those aged 25+).

Therefore, mature students (aged 25+) are more sensitive to the financial impact of tuition fees, the availability of financial incentives, offers of financial support and the cost of travelling between their home and their place of study. Conversely, the cost of living is more likely to affect the decision-making of younger students (18 year olds), likely due to a greater propensity for this cohort to move away from home to study.

The above suggests that allowing part-time HTQ students to access maintenance loans is likely to attract a younger audience. On the other hand, the reduction of fee limits for Foundation Years could grow their popularity among more mature students. In conclusion, to enable parity of choice, there needs to be parity of support across all post-secondary pathways.

Student, adviser, and parental awareness of post-secondary education pathways

Question 24: What are your views on the current barriers, including non-financial barriers, that providers face in offering and marketing level 4 and 5 courses?

As the education and training landscape is reformed, there is a risk that students and their advisers and parents are confused by the available options. We know interest in apprenticeships is growing, with half of UCAS applicants saying they are interested in this route, but one in three students surveyed for our [Where Next? What influences the choices school leavers make?](#) report tell us they received no information about apprenticeships from their school. Similarly, polling of parents and careers within UCAS' [Where Next? Improving the journey to becoming an apprentice](#) report found that whilst the world 'prestigious' was associated with university degrees by 76% of those polled, this compared to just 4% for apprenticeships - a further 14% rated them equally prestigious.

Alongside comparability of funding, parity of information across all routes – including technical education and apprenticeships – will be critical. For example, whilst a range of data exists around retention, completion and graduate outcomes for students progressing to degree programmes (e.g. data related to average salary and employability), as yet, little is available in relation to other routes such as apprenticeships and HTQs, nor is it available in a comparable format.

This highlights the need for high-quality access to high quality information, advice, and guidance about all options from a young age to help people to make better choices. It is in overcoming these information 'gaps' and assumptions that will ensure the successful roll out of HTQs.

Bringing parity to technical education

This diversification of the landscape needs the highest level of comprehensive CIAG, to ensure students are fully supported to make the right decisions for them. This is a key strategic priority for UCAS, with our ambition as stated above, being to position ourselves as 'route neutral' to ensure parity across all pathways including academic and technical routes. In 2021 there were 35,710 UK applicants to Level 4 or 5 programmes (excluding apprenticeships) through UCAS, leading to 18,735 acceptances – this represents 6% of all UK applicants and 4% of total UK acceptances.

To date, we have worked with the Government to provide HTQ-specific [content](#), linked to from UCAS' key landing page related to [study options](#). This is alongside a commitment to ensure that our student, adviser, and parent-facing communications are route agnostic, and focused on the subject and career goals of individuals i.e., how do I become a software developer? (As opposed to, what degree can I take in software development?) One major step forward is our new [Careers Quiz](#), which matches students to their best-suited career options, showing them the skills required, typical daily tasks and likely salaries. They can also see what courses previous students took in order to get to those careers, so they know exactly how to get there.

For 2023 entry, UCAS is also committed to introducing the functionality for providers of HTQs to flag their qualification as HTQ-approved, with the vision that students will then be able to filter and search by HTQ. It will also allow for the display of the HTQ kitemark, acting as a visual mark of approval.

However, a challenge therein is that there is no plan to maintain a central repository of all HTQ-approved courses. This means that the flagging of HTQs is dependent on individual universities and colleges diligence – it is UCAS' view that a single source of truth, akin to a register, maintained by Government or one of its agencies, would be a more efficient route to raising awareness of HTQs by allowing for UCAS' automated flagging of courses. It would also bring

benefits in terms of retrospective data and analysis – allowing for the understanding of who is taking HTQs, and to what end.

Similarly, whilst UCAS currently works with 150 colleges and around 4,000 Level 4 and 5 opportunities are listed on the UCAS search tool, some providers of HTQs will sit outside of the UCAS process. To bring parity to technical routes, we recommend that Government requires that providers of HTQs make use of UCAS services in the recruitment of their students. This would benefit students, by broadening choice for the 700,000 individuals that use our services, ensure that universities and colleges are able to reach these prospective students, and allow for complete and robust analysis as to the experience and journeys of those being placed onto HTQs.

Annex A – Level 3 MER analysis

Table 1: Five -year trend, numbers and percentages of total that meet threshold level of EE pass at A level, 2017-2021

	2017	2018	2019	2020	2021	Five year average
Total acceptances	391370	388025	394875	411755	417380	400,680
Number under threshold	2825	2975	3185	1900	1620	2500
Percentage of all acceptances	0.72%	0.77%	0.81%	0.46%	0.39%	0.62%
Percentage of all acceptances (excluding the 'Other' i.e. non-A level holder cohort)	0.98%	1.05%	1.1%	0.63%	0.53%	0.85%

Table 2: Percentage of English UCAS acceptances within different demographic groups by threshold groups (aggregation 2017-2021)

	All Acceptances	Gender		Ethnicity				
		Female	Male	Asian	Black	Chinese	Mixed	White
Under threshold	0.62%	0.51%	0.77%	0.99%	0.84%	0.46%	0.62%	0.53%
Above threshold or exempt	72.41%	74.74%	69.29%	69.94%	65.6%	83.43%	71.46%	74.26%
Others	26.97%	24.74%	29.94%	29.08%	33.57%	16.11%	27.92%	25.21%

	Region								
	East Midlands	East England	London	North East	North West	South East	South West	West Midlands	Yorkshire & Humber
Under threshold	0.63%	0.61%	0.58%	0.63%	0.57%	0.64%	0.54%	0.7%	0.78%
Above threshold or exempt	72.49%	75.09%	72.23%	68.44%	69.32%	78.19%	74.66%	67.66%	69.3%
Others	26.88%	24.3%	27.19%	30.93%	30.12%	21.17%	24.79%	31.64%	29.92%

	POLAR 4	
	Quintile5	Quintile1
Under threshold	0.41%	0.86%
Above threshold or exempt	80.76%	63.53%
Others	18.83%	35.61%

Table 3: Percentage of English UCAS acceptances within different provider and subject groups by threshold groups (aggregation 2017-2021)

	Tariff			Subject – Stem		Subject (jacs3 grouping)				
	Lower	Medium	Higher	STEM	Non-STEM	Computer Sciences	Business and Administration	Education	Law	Technologies
Under threshold	0.93%	0.63%	0.07%	0.63%	0.62%	1.06%	0.92%	0.88%	0.81%	0.8%
Above threshold or exempt	58.98%	76.12%	92.27%	72.51%	72.32%	53.28%	66.07%	61.81%	79.77%	61.91%
Other	40.1%	23.25%	7.66%	26.85%	27.06%	45.67%	33.0%	37.3%	19.43%	37.29%

Jacs3 subject groupings presented are the 5 most represented in the below threshold cohort.

Annex B – Level 2 MER analysis

Table 1 - Percentage of all English 18 year old state school UCAS applicants within different background groups that met the threshold level of Grade four or above in English and Maths in 2020

Threshold level	All applicants	Asian	Black	Chinese	Mixed	White	FSM	non-FSM	Women	Men
At or above Grade 4 in EM	89.4%	87.0%	79.9%	92.4%	88.0%	91.3%	80.7%	90.1%	89.5%	89.2%

Threshold level	POLAR4 Q1	POLAR4 Q5	East Midlands	East of England	London	North East	North West	South East	South West	West Midlands	Yorkshire and The Humber
At or above Grade 4 in EM	85.7%	92.8%	91.2%	90.4%	86.9%	90.1%	88.7%	91.9%	91.4%	87.2%	89.6%

Table 2 - Percentage of all English 18 year old state school UCAS acceptances within different provider/subject groups that met the threshold level of Grade four or above in English and Maths in 2020

Threshold level	All acceptances	Lower tariff	Medium tariff	Higher tariff	non-STEM subjects	STEM subjects	Medicine and Dentistry	Creative Arts and Design	Education	Computer Sciences	Subjects Allied to Med.
At or above Grade 4 in EM	89.7%	81%	90.7%	98.2%	88.4%	91.2%	99.6%	83%	84.3%	85%	88.3%

Table 3 – Percentage of total 2020 UCAS acceptances (all ages and domiciles) accounted for by the analytical population (English 18 year old state school) used in this response

Threshold level	Lower tariff	Medium tariff	Higher tariff	non-STEM subjects	STEM subjects	Medicine and Dentistry	Creative Arts and Design	Education	Computer Sciences	Subjects Allied to Medicine (inc. Nursing)
Analytical population coverage of all acceptances	31%	36.1%	34.4%	33.2%	34.2%	34.6%	31%	27.6%	32.8%	24.1%

Annex C – Level 2 MER analysis updated to include ‘good results at Level 3’ and FSM/MEM exemptions

Table 4 – Percentage of all 2020 English 18 year old state school UCAS applicants that are at or above the threshold level of Grade four or above in English and Maths, with various exemptions included

Threshold level	Grade 4 in EM only	With ‘good results at Level 3 (CCC at A level)’ exemption	With ‘FSM’ exemption	With ‘MEM group 1’ exemption	With ‘good results + FSM’ exemption	With ‘good results + MEM group 1’ exemption
At or above threshold	89.4%	90.5%	90.8%	90.7%	91.8%	91.8%