



Unconscious Bias Report 2016

UCAS

Executive summary

As Professor Steven Schwartz stated in his landmark report 'Fair Admissions to Higher Education' (2004) 'a fair admissions system is one that provides equal opportunity for all individuals, regardless of background, to gain admission to a course suited to their ability and aspirations.'

As higher education providers (HEPs) are responsible for their own admissions policies and processes, the challenge is to ensure that admissions are, and are seen to be, fair for all students.

In response to concerns about persistent observed differences in the headline offer rates to different ethnic groups, the Government asked UCAS to consult with the HE sector about the feasibility of introducing name-blind applications, recognising that this approach has been used successfully to address the risks of bias in graduate recruitment.

In approaching this task, we have looked at the changing nature of the undergraduate admissions market and the evidence of bias in admissions to HE, examined how HEPs seek to minimise the risks of bias – in comparison with other countries and graduate recruiters – and have sought feedback from HEPs about different models for introducing name-blind applications.

In placing this work into context it's relevant to highlight the complexity of the admissions landscape. HEPs' decision-making processes are closely coupled with institutional missions, and as such policies and practices vary between providers. For example, application processing and admissions decision-making is undertaken centrally at some providers, and in a distributed way by academics in schools, departments or faculties at others. Mixed models operate in many HEPs to accommodate the different admissions requirements of certain subjects, and admissions for domestic and international students are often handled separately.

When UCAS provides data and information from students' applications to HEPs, the data and information from application forms, references and contextual data is typically transferred into universities' admissions or student records systems, and is used for multiple purposes. In addition to admissions decision-making, data may be used to contact students to offer services and support, determine fee status, or to verify qualifications and other information. These processes often run in parallel with admissions decision-making to speed the time from receipt of application to an initial decision.

Our survey of HEPs found that almost all are very aware of the risks of bias in admissions decision-making, and employ a wide variety of good practice, including having and applying clear admissions criteria, ensuring that more than one person is involved in decision-making, and requiring equality and diversity training. There are also a number of safeguards built into the admissions process itself, as UCAS does not share information about applicants' ethnicity, religion, sexual orientation, gender identity, parental education and parental occupation with HEPs, until after admissions decisions have been made or when the cycle has closed.

With a falling number of 18 year olds in the population and pressures on international student recruitment, HEPs are in a market which encourages student recruitment, and acts to counter risks of bias. This is reflected in increasing levels of offer-making to all student groups. For example, in 2015, 93 per cent of students who applied before 30 June, and made five application choices, received at least one offer.

Additionally, UCAS' analysis on offer-making and offer rates by ethnic group finds no evidence of systemic bias in the admissions system, although we did identify a number of instances where offer rates to certain groups were outside of what might be expected, if offers were made solely on the basis of predicted grades and the course applied to.

In examining the potential for introducing name-blind applications UCAS has explored two options with HEPs and HE technology vendors: a model where UCAS withholds information such as applicants' names centrally, and a model where HEPs can mask information locally from those individuals involved directly in admissions making decisions.

In their feedback HEPs were concerned that if UCAS was to mask names centrally, this could affect their ability to develop and maintain relationships with prospective students, hamper verification activities, and undermine efforts to widen participation. Equally, technology vendors indicated that such an approach would require redevelopment of their software products, on top of local implementation requirements at HEPs.

A more attractive solution is for HEPs to employ a name-blind approach at local level. This could enable applicant communications, verification and widening participation support activities to operate effectively, whilst withholding names from those individuals involved in admissions decision-making. However, this too would require redevelopment by a number of the major HE technology vendors as well as local process re-engineering and implementation.

All HEPs recognise the importance of demonstrating that their admissions practices are fair and transparent. Our evidence gathering exercise generated a groundswell of commitment to improve and extend unconscious bias training to all individuals involved in admissions decision-making, and to identify and promote good practice in minimising the risks of bias. To investigate the extent to which a name-blind approach could complement these activities we are encouraging HEPs to run name-blind projects to evaluate different approaches, and identify the challenges and costs of wider implementation. In addition, UCAS will develop an information-masking capability for those providers who use its web-link service to support their admissions management.

We also recommend further research into understanding if there is bias in admissions, and encourage HEPs to regularly scrutinise their own offer-making and admissions data, and address any unexplained differences between expected and observed outcomes.

We are extremely grateful to all of the HEPs, technology suppliers, and stakeholders in the UK and overseas who have shared their views and insight with us. In particular we would like to thank Supporting Professionalism in Admissions (SPA) for undertaking a literature review on the evidence base for name-blind applications.

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UNCONSCIOUS BIAS IN ADMISSIONS TO HIGHER EDUCATION: EVIDENCE GATHERING ON THE USE OF NAME-BLIND APPLICATIONS

1. Introduction

Joining a diverse student body is an essential part of the higher education (HE) experience in the UK. Being part of a student community drawn from a broad range of backgrounds encourages students to explore and understand why others hold different opinions and perspectives, and to learn how to examine and solve problems in different ways – essential skills for employment and citizenship.

Given the range of careers and employment opportunities a degree opens up, and the financial, social, and wellbeing benefits of having studied at a higher level, it is important that opportunities are open to all with the potential to succeed. As such, universities and colleges make significant efforts to ensure their admissions policies are fair and transparent, and give all applicants who can demonstrate they have the potential an equal opportunity to secure a place, regardless of their background, sex, or ethnicity.

However, there are concerns in government that well-qualified people are not getting offers from universities and colleges because of bias in higher education admissions. The Rt Hon David Cameron MP, when Prime Minister, raised concerns in a Guardian article in October 2015 about the disparity in offer rates to black and white applicants. He noted: ‘The reasons are complex, but unconscious bias is clearly a risk’.

The government noted that research, primarily from the United States, showed that where there appeared to be evidence of bias in employee recruitment, using a name-blind strategy could help employers build a more diverse workforce. As a result, the government announced that a cohort of major employers – including the BBC, NHS, Deloitte, and KPMG – would be implementing name-blind recruitment systems.

The government therefore asked UCAS to consult with the HE sector about the feasibility of introducing name-blind applications to HE. This would involve masking an applicant’s name during the initial stage of the admissions process, prior to making a decision about whether or not to invite someone to an interview or to make them an offer, as a potential means for reducing the risk of bias.

This report presents the findings from this evidence gathering exercise, and makes a number of recommendations for taking this work forward and addressing the risks of bias in admissions to HE.

2. UCAS’ evidence gathering exercise

Through a comprehensive literature review¹ undertaken by Supporting Professionalism in Admissions (SPA), a national survey of universities and colleges, online focus groups, stakeholder discussions, and workshops with higher education providers (HEPs), UCAS has sought feedback from universities and

¹ Supporting Professionalism in Admissions (SPA) is the independent and objective voice on UK HE admissions. SPA promotes professionalism, fair admissions, and access to HE by developing and leading on evidence-based good practice in the recruitment and selection of students. SPA’s name-blind evidence report can be found at www.spa.ac.uk/resources/name-blind-applications.

colleges and their technology suppliers about introducing a name-blind approach to admissions. Alongside this, UCAS has sought feedback on how HEPs already seek to minimise the risks of unconscious bias in admissions, and explored ways of strengthening this.

120 HEPs took part in the survey and the results from this, together with feedback from stakeholders and technology suppliers, are set out in this report. It covers:

- the undergraduate admissions market
- the evidence for bias in admissions
- how UK HEPs minimise risks of bias
- how HEPs in other countries minimise risks of bias
- comparisons with employee recruitment
- the findings of the evidence gathering from HEPs and HE technology vendors
- conclusions
- recommendations

3. Findings from the evidence gathering exercise

3.1 The undergraduate admissions market

Since the removal of student number controls in England, HEPs have had the ability to recruit as many undergraduate students as they want, aside from to courses where numbers remain regulated (such as NHS profession-based courses and veterinary science), and subject to practical constraints on teaching, laboratory and performance space, student facilities, and accommodation.

Many, although not all, HEPs have sought to take advantage of this freedom to grow their student numbers, increasing the competition for well-qualified students. Coupled with falling A level attainment and demographic changes, this has created an environment where a majority of HEPs are actively recruiting students to a majority of their courses. Typically, this means that students applying to these courses, who meet their minimum entry criteria in terms of predicted grades, will get an offer. It also means that providers are more able to accept more 'near miss' students, contextualise offers, and offer students a place on an alternative course or foundation programme if the course the student has applied to is oversubscribed, or the student does not secure an offer of a place.

While all courses at a small number of higher tariff universities are competitive, selectivity is not the preserve of the higher tariff providers. Across all kinds of universities and colleges, selection operates where:

- numbers remain capped in specific subjects (NHS profession-based programmes and veterinary science)
- professional bodies require the demonstration of specific traits or competencies for admission (NHS profession-based courses, psychology, physiotherapy, and social work, for example)
- there are specific degree programmes which are highly specialist and/or highly valued by graduate employers

Evidence for this comes from UCAS' offer-making analysis. In 2015, the total number of offers made to main scheme applicants (those applying on or before 30 June) increased by 81,000 (+4.5 per cent) to 1.9

million, the highest number recorded. This continues the trend seen since 2013 of an increasing number of offers made each year. The number of offers made to applicants who received offers for all five of their choices increased by 41,200 (+6 per cent), and the total number of offers made to applicants with four or five offers reached a record high at 1.3 million².

This meant that in 2015, 93 per cent of main scheme applicants who made five choices received at least one offer, and 56 per cent of these applicants received four or five offers³.

Overall, in 2015, offer rates to UK 18 year old applicants from English providers increased to 78 per cent (+0.9 percentage points), the highest level recorded⁴. These increases in offer-making are as a result of HEPs making more offers to ensure they recruit sufficient numbers of students.

This can be seen in the high offer rate levels seen in the transparency data published by UCAS in June 2016, with the offer rate at most providers typically in the 70 to 80 per cent range for 18 year old UK applicants⁵.

Table 1: 2015 Offer rates to UK domiciled main scheme applicants by tariff group

2015 offer rate	All UK main scheme applicants	18 year old UK main scheme applicants
Higher tariff	63.0%	73.3%
Medium tariff	66.5%	77.5%
Lower tariff	67.6%	79.6%

For 18 year old applicants who apply with A level results pending, it is possible to look at offer rates by the profile of their predicted grades. The data for the most able English domiciled applicants, who will largely be applying to higher tariff providers, shows that offer rate varies considerably by predicted grade profile.

For example in 2015, applicants predicted AAB had an offer rate of 88.1 per cent, higher than those predicted ABB (86.3 per cent), or BBB (84 per cent). However, applicants with higher predicted grades had a lower offer rate, with those predicted three A*s having an offer rate of 79 per cent, and those predicted A*A*A, an offer rate of 77.7 per cent, reflecting competition for the most highly selective courses⁶.

Despite competition for places among the most able, almost all will receive at least one offer. In 2015, 99.7% of English 18 year old A level students predicted to achieve three A*s received at least one offer, with 98.5% of students predicted BBB receiving at least one offer⁷.

² Figure 24 UCAS Undergraduate End of Cycle Report 2015.

³ Figure 26 UCAS Undergraduate End of Cycle Report 2015.

⁴ Figure 28 UCAS Undergraduate End of Cycle Report 2015.

⁵ Source: www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-reports-sex-area.

⁶ Figure 32 UCAS Undergraduate End of Cycle Report 2015.

⁷ Figure 33 UCAS Undergraduate End of Cycle Report 2015.

3.2 The evidence of bias in higher education admissions

Changes in the undergraduate admissions market have created an environment where many providers are incentivised to make more offers, and are doing so. This reduces the likelihood of bias since the imperative is to fill places with students who have the ability to complete the course.

As a consequence, the number of UK students admitted to HE has increased since 2012. Against this background, entry rates have increased for all ethnic groups, reaching their highest recorded levels in 2015.

However, there are large differences in entry rates to HE by ethnicity for 18 year old English school students. Since 2006, the Black ethnic group has recorded the largest increase in entry rates, rising from 20.9 per cent in 2006 to 36.7 per cent in 2015, a proportional increase of 75 per cent. By comparison, entry rates for young people from the White and Black ethnic groups were equivalent in 2007, at 22.2 per cent and 22.5 per cent respectively. However, by 2015, the entry rate for the White group had increased to 27.8%, a proportional increase of 25 per cent. Today, the White group has the lowest entry rate of all ethnic groups⁸.

There is a different pattern at higher tariff providers. While entry rates are highly differentiated by ethnicity, and the entry rates from the Chinese ethnic group are the highest (26.5 per cent), the lowest entry rates to higher tariff providers are the Black ethnic group at 5.6 per cent in 2015. The entry rate for the White ethnic group is 8.1 per cent, the second lowest.

Young people recorded in the Black ethnic group have had the largest proportional increase in entry rates to higher tariff providers over the period, increasing from 2.9 per cent in 2006 to 5.6 per cent in 2015, a proportional increase of 95 per cent. Despite this, the entry rate for the Black ethnic group remains 2.5 percentage points lower than the White ethnic group at higher tariff providers⁹.

Further analysis shows that this difference reflects A level attainment, since the pattern of entry to higher tariff providers for English 18 year old state school students by ethnicity, mirrors the pattern of entry for the same group by A level attainment at ABB or above. For example in 2015, the entry rate for the White ethnic group holding ABB+ was 7.8 per cent, and the Black ethnic group was 4.5 per cent¹⁰. Other factors such as combination of subjects and grades, admissions tests, interviews, and contextual factors, may also play a part in entry to HE.

UCAS has looked in detail at offer-making to 18 year old A level applicants by ethnic group at higher tariff providers for both the 15 October and 15 January deadlines (over the period 2010 to 2015). Courses with an October deadline are by their nature highly competitive, covering all programmes at the universities of Oxford and Cambridge, and applications to study medicine, dentistry, and veterinary science.

While there are many factors which may influence the decision of whether or not to offer an applicant a place, such as relevancy of subjects to entry requirements, the two dominant factors are their predicted grades and the course they have applied to. Different groups of applicants with the same predicted A level grades may make different patterns of course choices. This can result in groups receiving very different

⁸ Figure 88 UCAS Undergraduate End of Cycle Report 2015.

⁹ Figure 92 UCAS Undergraduate End of Cycle Report 2015.

¹⁰ Figure 93 UCAS Undergraduate End of Cycle Report 2015.

levels of actual offer rates, mostly reflecting their particular combinations of courses, and strength of predicted grades.

Recent UCAS analysis enables a comparison between the actual offer rates to different ethnic groups to the offer rate which might be expected given applicants' predicted grades and the course(s) applied to. Observed differences between the actual offer rate for a group and the average offer rate represent a difference in offer-making, specific to that group, which cannot be accounted for by the choices made by that group and the strength of their predicted grades.

Table 2: Summary analysis of offer rates to October deadline applicants from the UCAS Undergraduate End of Cycle Report 2015 (high predicted grade A level applicants only)

October deadline (2010 – 2015)	Asian	Black	Mixed	White
Offer rate	47.6%	45.2%	63.6%	66.7%
Average offer rate	49.4%	47.6%	63.0%	66.1%
% point difference in offer rate	-1.8	-2.4	+0.6	+0.6

As might be expected, offer rates for the October deadline are highly differentiated by predicted grade profile¹¹. Overall, offers to the White group were close to expected. For the Black group, the overall offer rate was 2.4 percentage points lower than expected, and for the Asian group, 1.8 percentage points lower.

Table 3: Summary of analysis of offer rates to January deadline applicants from the UCAS Undergraduate End of Cycle Report 2015 (high predicted grade A level applicants only)

January deadline (2010 – 2015)	Asian	Black	Mixed	White
Offer rate	75.2%	75.4%	80.7%	84.0%
Average offer rate	75.2%	75.9%	80.6%	84.0%
% point difference in offer rate	0	-0.5	+0.1	0

These findings show that offer rates from higher tariff providers to different ethnic groups at the January deadline are close to average offer rates¹².

UCAS has also recently published a first tranche of data examining applications, offers, and offer rates by named individual HEP. This has been accompanied by a further publication of time series data by tariff grouping. The table below shows the data for UK 18 year olds, who submitted their applications before the 30 June deadline¹³.

¹¹ Figures 41 & 43 UCAS Undergraduate End of Cycle Report 2015 (NB: figures for the Asian and Mixed groups are not in the Report).

¹² Figures 36 & 38-40 UCAS Undergraduate End of Cycle Report 2015.

Table 4: Summary analysis of application, offer, and entry rates by ethnic group from UCAS Undergraduate reports by sex, area background, and ethnic group (all UK 18 year olds)

Higher tariff (2015)	Asian	Black	Mixed	White
Applicants per 10k of population	2,599	2,081	2,162	2,029
Accepts per 10k of population	911	530	994	955
Offer rate	62.2%	60.9%	73.0%	75.5%
Average offer rate	63.7%	63.8%	73.0%	75.1%
% point difference in offer rate*	-1.5	-2.9	0	+0.4

*Taking only predicted grades held and the course applied to into account reduces differences in offer rates between ethnic groups to much smaller values, indicating that the offer-making process operated by universities is broadly fair. Small differences remain for the Black and Asian ethnic groups.

UCAS concludes that, across the UCAS admissions scheme, there is no evidence of systemic bias in the admissions system. However, there are providers – from the higher, medium, and lower tariff groups – whose offer rates to certain groups are outside of what might be expected if offers were made solely on the basis of applicants’ predicted grades and the course(s) they applied to. Although variation in offer rates is seen among all groups of applicants, offer rates lower than what might be expected are more often than not seen in the offers made to the Black and Asian groups.

It is important to emphasise that variation in offer rates outside of what might be expected is not in itself evidence of bias. There are other factors which may be taken into account when deciding whether or not to make an offer to an applicant, for example, the subjects and subject combination of their A levels or other qualifications (especially for STEM subjects), interviews and admissions tests (for a number of medical, nursing, and social work courses), and prior experience or contextual factors. These factors are not controlled for in UCAS’ analysis.

Also, universities cannot make offers if students do not apply, and UCAS’ equalities data shows that certain ethnic groups are more likely to apply to some HEPs than others, and that geographical proximity appears to be a major factor.

Finally, it is worth noting that if all HEPs made offers to all groups exactly at the rate expected based on their predicted grades and course applied to (thereby correcting for concerns about unconscious bias), modelling shows that would not make a material difference to the entry rates of underrepresented groups in HE.

¹³ Source: www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-reports-sex-area.

3.3 How HEPs seek to minimise the risks of bias

UCAS asked HEPs what steps they take to minimise the risks of bias in admissions. It is evident that the vast majority of HEPs that responded to the survey were well aware of the risks that unconscious bias could pose to fair admissions, and were employing a range of measures to minimise these.

Common examples reported from the survey included:

- the consistent application of the HEP's admissions policy, the use of predefined selection criteria, and cross-checking of decisions
- having teams of well-trained, professional admissions practitioners – this provides consistency, promotes good practice, and enables decisions to be made or reviewed by more than one person
- having a second person review applications that do not receive an offer
- providing equality and diversity, interview, and unconscious bias training – 71 per cent of respondents said that some form of training was mandatory, although most HEPs reported they offer generic equality and diversity training rather than training about dealing with unconscious bias
- using contextual data
- using Equality Impact Assessments, internal audits of processes and procedures, and random sampling of admissions decisions

Additionally, a small number of HEPs operate internal processes which mask information (such as sex, nationality, home address, date of birth, and criminal convictions, but not name) from those making initial admissions decisions.

However, responses from a very small number of HEPs indicated a lack of awareness of the risks, mistaking egalitarian views and a diverse student intake as sufficient means for addressing risks. While such providers may be admitting large numbers of disadvantaged or BAME students, they might still not be making as many offers as might be expected, or be contributing as much as they could be to widening participation (WP).

3.4 How HEPs in other countries minimise risks of bias

There is significant literature about how other countries seek to widen access to HE for underrepresented groups, particularly those defined by ethnicity and socio-economic background. For example, universities in both the United States and Australia use contextual data and information to place academic achievement in the context of the educational environment in which students have studied, and additional tests and interviews are used for highly competitive courses such as medicine and dentistry.

However, there is limited information about practices used to minimise risks of unconscious bias. We noted good practice in the University of California's system where there is mandatory annual training for all staff and reviewers involved in admissions, including on unconscious bias, and all applications are considered by at least two people. We did not find any examples of universities using a name-blind approach to admissions.

3.5 Comparisons with employee recruitment

There is growing evidence that a name-blind or CV-blind approach to graduate and employee recruitment can deliver positive results. While parallels can be drawn between selection for admissions to HE and recruitment for employment, these are inherently different activities for a number of reasons.

- Employee recruitment is usually focused on a single, or a small number, of vacancies. It is a highly competitive process between individuals. As outlined at 3.2 above, admissions to HE is now primarily a competitive process between providers seeking to attract and recruit students. Where there is competition among applicants, this is typically for one of a large number of places.
- Employee recruitment generally involves an interview as the final stage of the assessment process. Selection interviews are only used for a minority of HE courses, and when they are used, will form part of the overall assessment, rather than being used to make the final decision.
- Employee recruitment and student recruitment are subject to different legal considerations. For example, students are viewed as consumers by the Competition and Markets Authority, and the vast majority of student recruitment is not subject to employment law, although both are subject to the Equality Act.
- Students are generally recruited on their potential to succeed on a course over a prolonged period, taking into account the context of their current achievements. Employee recruitment is more likely to focus on current ability, with less emphasis on context.

3.6 Evidence gathering on the potential feasibility of name-blind applications

To understand the feasibility and practicality of introducing name-blind applications, UCAS has engaged with HEPs and the sector's main technology providers to explore two models: one where data is masked centrally by UCAS, and one where data is masked locally by HEPs.

To put the feedback into context, it is necessary to understand how admissions works in practice.

There are a number of safeguards to minimise bias built into the admissions process. UCAS does not share information about applicants' ethnicity, religion, sexual orientation, gender identity, parental education, and parental occupation with HEPs until after admissions decisions have been made, or the cycle has closed. While this information is used to monitor diversity, it cannot be used to influence outcomes for individuals. It should, however, be noted that UCAS does provide information about an applicant's nationality, as this is necessary help determine fee status.

When UCAS provides data and information from students' applications to HEPs, the data and information from UCAS application forms, references, and contextual data is transferred into universities' own IT admissions or student records systems. These systems are typically provided by one of five main technology vendors (Capita, Ellucian, Oracle, SAP, and Tribal), or are the HEP's own in-house systems. Many smaller HEPs and colleges use UCAS' web-link service.

The data is distributed across HEPs and used for multiple purposes. In addition to admissions decision-making, this may include contacting students to offer services and support, determining fee status, the verification of qualifications and other information, counter fraud, DBS checks, etc. These processes often run in parallel with admissions decision-making to speed the time from receipt of application, to making an offer or other decision.

The admissions management and decision-making process is different at each HEP. Admissions policies and processes are determined by the institutional mission, strategic objectives, and course portfolio, and are also influenced by organisational structure and their underpinning technological capabilities. For example, application processing and admissions decision-making may be undertaken centrally by administrators, or in a distributed model by academics in schools, departments, or faculties. Mixed models operate in many HEPs, and admissions for domestic and international students are often handled separately and subject to different policies and processes. For degree programmes which are accredited by professional, statutory, and regulatory bodies (PSRBs), admissions policies and decision-making criteria are in part determined by these organisations.

Policies and processes are likely to differ as much between different programmes of study at one provider as between different HEPs. **Appendix A** highlights the multiple stages in admissions management.

3.6.1 Option one: UCAS masks names centrally and withholds this information from HEPs until an initial admissions decision is made

UCAS is able to develop and implement the capability to withhold names from the initial data supply to HEPs. This could be developed for inclusion in the new UCAS Undergraduate application service and its associated data transfer service.

However, HEP respondents to the survey had reservations about this approach. The primary concern expressed by providers was the potential detrimental impact on the personal relationships they have, and want to build, with applicants. It was felt that if UCAS was to withhold an applicant's name, even for a short time, this could have a significant negative impact on the student experience and conversion, as it would prevent HEPs communicating directly with applicants on a personal basis. HEPs were especially concerned about the potential impact on WP applicants, as without a name, they cannot identify applicants who have been part of outreach activities and who they want to welcome and offer additional support to. It was felt that withholding an applicant's name could hamper making contextualised offers, offering alternative courses, or offering support to applicants at risk of dropping out of the process.

'We believe any removal of names within the application process is likely to have a detrimental impact on these activities [aimed at supporting the transition to degree studies for applicants from disadvantaged groups]. Statistically, this group of students is less likely to convert, so positive relationship building, where students are seen as an individual, rather than a number, is key for this group.

'It [name-blind] may have unintended consequences which would impact detrimentally on precisely the groups which it is perceived would be assisted. For example, contextual factors could not easily be taken into account and corresponding positive action implemented.'

Other concerns cited with this approach were:

- risk of inability to fulfil consumer protection responsibilities
- inability to carry out identity checks, or verify qualifications, fee, and immigration status
- increased likelihood of errors

- that masking the name of the applicant wouldn't in itself be sufficient to achieve the stated aim because of the other places where an applicant's name appears in the information provided by UCAS (e.g. someone's email address, personal statement, and/or reference), and because ethnicity can be inferred from other information provided (e.g. nationality, the qualifications someone has taken, such as a GCSE or A level in a native language). Other information, such as sex and age, could also give rise to unconscious bias

In addition, conversations with the main technology vendors identified that it would be technologically complex, expensive, and time consuming for them to redevelop their software to accommodate UCAS withholding data centrally. It would also then require HEPs to install new, upgraded versions of vendor software.

One said that it would take up to two years to update their software to accommodate a data supply from UCAS which excludes an applicant's name. Two others indicated that if UCAS could not provide a name, it would necessitate major re-engineering of their software, as name is used as a key feature for indexing and duplicate handling. Another provider's software is designed so that it is customisable by HEPs, and they indicated that HEPs would need to undertake considerable work to realise this solution. Given the likely costs involved and other business priorities, software companies have said they would be reluctant to embark on this redevelopment unless mandated to do so by government or a regulatory body.

3.6.2 Option two: UCAS supplies names to HEPs and HEPs locally mask the name from decision-makers until an initial admissions decision is made

The second option is to encourage technology vendors to provide software solutions which give HEPs the functionality to mask information, such as name, on a local basis. This would give HEPs control of what information was shared with whom and when. For example, names could be provided to those staff responsible for applicant communications, WP support, verification, fee status, and counter-fraud activities, while the name is withheld from those deciding whether or not to make an offer or invitation to interview.

This is more attractive from an admissions management perspective, given the different policies and procedures employed by HEPs, and this capability already exists in some versions of some existing university admissions systems. For example, the latest versions of software offered by two providers already provide HEPs with the capability to mask information locally, including name.

However, the largest sector technology vendor does not offer masking capability. To offer this functionality, they believe they would need to make changes to their core software application, which HEPs would then need to apply via their biennial updates. It may take a number of years for all providers to move to this new version. Providers that also use their web interface may also need to redevelop this themselves.

Although this approach would address some of the concerns raised about communications with applicants, consumer protection compliance, and fraud and verification activities, at most providers it would likely require substantial process re-engineering and IT redevelopment, design and implementation of new versions of student records and management information software. The cost of this could be significant.

This is likely to be particularly problematic for smaller providers, where admissions-related tasks may be undertaken by one or two people. Concerns were also raised about the fairness of such a system, given that some international students are recruited directly, and that at Clearing, the use of a name-blind approach would not be practical given the speed at which the system operates.

It is also worth flagging that neither solution addresses the risk that an applicant's name also often appears elsewhere in their application – for example, in their email address, personal statement, and reference – and that eliminating this is likely to be near impossible, especially with regards to email addresses. An applicant's ethnicity may also be inferred from their nationality or qualifications they have taken or are taking; information which is essential to their application and assessment of fee status.

4. Conclusions

Although there is evidence from research, particularly from the US, of unconscious bias operating in employee recruitment and the value of using a name-blind approach, it cannot be assumed that either the problem or potential solution are directly applicable to admissions to HE, given differences in purpose and levels of competition.

The market in undergraduate admissions means that many HEPs are seeking to recruit rather than to select students for admission to their most of their programmes. This is visible in significantly increased levels of offers made to all groups of applicants. In 2015, 93 per cent of students who applied before 30 June and made five choices received at least one offer. This environment drives a business imperative to fill places.

UCAS' analysis on entry to HE by ethnicity, offer-making, offer rates, and average offer rates all point towards admissions to HE being fair at a national level. While there are large differences in offer rates by ethnic group, in most cases this can be attributed the applicant's predicted grades and how competitive the course is that they applied for.

This is backed up by UCAS' most recent data on applications, offers, and offer rates by named providers. While this reinforces the evidence that overall admissions are fair, it also suggests that a small number of providers need to examine why there are significant differences between observed and average offer rates for some groups.

There are over 380 HEPs using the UCAS Undergraduate admissions service for recruitment to full-time undergraduate-level programmes. Having looked at the feasibility of introducing a name-blind approach, it is evident that HEPs and technology vendors have significant concerns about a model in which UCAS centrally withholds names. As outlined above, HEPs are concerned that they will not be able to maintain personal contacts with applicants and support WP students, as well as wider risks to verification, compliance, and operational efficiency. Technology vendors have signalled that major re-engineering of their software products would be required.

Although a higher education provider-level implementation addresses some of these issues, it would still require software redevelopment by some technology providers, require providers to implement software, and necessitate business process re-engineering and technology investment.

There is a sense that there is insufficient evidence of a problem to warrant the scale of investment and business change that would be needed to adopt name-blind applications. This is particularly the case for HEPs that are recruiting to all, or most, of their courses, and for smaller and specialist course providers. Making the case for investment is likely to be equally problematic for HEPs whose equality data shows that there are no significant differences in their offer rates against expected offer rates for different ethnic or nationally underrepresented groups.

A typical HEP comment from the evidence gathering survey said: ‘The university recognises that unconscious bias may exist in certain situations, although there appears to be very little evidence that this takes place in the context of university admissions, particularly for recruiting providers’.

Dr Vikki Boliver commented: ‘If admissions decisions are influenced by conscious or unconscious bias, then the solution is not to remove information that triggers those biases, but to develop processes and foster cultures in which such biases are recognised and redressed’.

5. Recommendations

Based on the evidence gathering work and conversations with HEPs, technology providers, and stakeholders, UCAS proposes seven recommendations to develop the evidence base on unconscious bias in admissions, promote good practice, and encourage HEPs to undertake name-blind application projects to better understand its applicability and potential use in admissions.

Recommendation one: HEPs should run name-blind admissions decision-making projects at a local level

There is support from the HE sector for conducting projects using a name-blind approach at a local level in the 2017 admissions cycle, to test its applicability to HE admissions, its efficacy in addressing concerns about unconscious bias, and to better understand the likely costs of a widespread implementation. HEPs are encouraged to explore using a name-blind approach for different subjects, types of courses, and for those using different recruitment and selection methodologies.

To support providers, UCAS will coordinate project activities, assist with the design of data collection and analysis (where requested), and collate, analyse, and publish the findings. SPA will also offer support and advice to HEPs piloting this approach.

Recommendation two: SPA should take the lead on the development of good practice and enhancement of unconscious bias training for those involved in admissions

There is widespread support across the HE sector for the development and promotion of good practice to minimise the risks of bias in admissions and development, and promote training specifically in recognising and addressing unconscious bias in admissions. A typical quote from the UCAS survey said: ‘[x] would welcome a sector-wide commitment to provide training on unconscious bias and cultural awareness for all staff involved in the recruitment and selection of students. SPA could lead on the development of this training to ensure there is consistent access to good quality materials and resources across the sector’.

We would also encourage HEPs to work towards ECU's race equality charter mark.

Recommendation three: HEPs should regularly monitor and review their admissions data and address any unexplained differences in offer-making or admissions outcomes

It is good practice for providers to monitor and regularly review their admissions data to evaluate the efficacy of their admissions policies and procedures. This enables swift action to be taken at any stage of the admissions process if evidence of bias is found. SPA has recently published new good practice on monitoring and using admissions data to evaluate the fairness of admissions policies and criteria in the context of progression, retention, and outcome strategies. HEPs are encouraged to engage with and use this good practice.

To support providers, UCAS will continue to publish and expand equalities data, which includes data on application, offer, and acceptance rates by sex, ethnicity, and area background.

Recommendation four: HEPs could consider introducing a review of applications marked for rejection

At its simplest, initial admissions decision-making resolves applications into one of three groups: those to whom the university wishes to make an offer, those whose applications are rejected, and those applications which require further consideration. Eventually, all applications result in either an offer or a rejection.

Many HEPs already have processes in place to enable a review of rejected applications against their admissions criteria, covering either all or a sample of these decisions. The use of a review stage, often conducted by different individuals, enables admissions teams to provide a second check against entry criteria, including making sure contextual information and data have been applied in line with the HEP's policy. If not already undertaken, consideration can be given for a changed course offer. Involvement of different admissions staff, where this has not already happened, may also help reduce the risk of bias.

HEPs that do not already use some form of review are encouraged to consider doing so. In addition, HEPs could be encouraged to review their decision-making process annually to ensure fair and equitable treatment. Such a review should inform admissions policies for the following year.

Recommendation five: There should be further research into understanding if there is bias in HE admissions

There is support from HEPs and stakeholders for further research to understand if there is bias in admissions.

UCAS will support this recommendation through the publication of equalities data (recommendation three), and by making a richer set of individual-level data available to authorised researchers via the Administrative Data Research Network (ADRN).

Recommendation six: UCAS should improve support for HEPs using contextualised admissions

The use of contextual data, which seeks to put an applicant's academic and other achievements into wider educational, socio-economic, or geo-demographic contexts, is a well-established means for addressing fair admissions, and may aid HEPs' widening participation objectives.

Contextual data and information may be used in numerous ways and places during the admissions process. For example, this may include to flag an application for further consideration rather than rejection, to guarantee an interview or audition, or to inform the decision whether or not to accept someone who has not met the terms of their conditional offer. In addition, a small number of HEPs use contextual data to make lower offers to applicants with certain contextual criteria. The use of contextual data may take account of educational, geo-demographic, and/or socio-economic context, as well as other individual aspects of educational disadvantage.

Universities and colleges employing contextual data use information provided by UCAS from the application form, a basket of contextual data offered through UCAS' contextual data service, their own data, such as if the applicant has successfully taken part in a widening participation activity, and information to provide support to applicants (such as care leavers) through the admissions process and beyond. Third party data services may also be used. A number of HEPs responding to the evidence gathering survey asked UCAS to strengthen the services it provides to support contextualised admissions.

UCAS will review with HEPs what data and services they need to undertake contextual admissions more effectively, and will deliver any changes as part of the redevelopment of the UCAS Undergraduate application service.

Recommendation seven: Those responsible for fair access and widening participation should consider what further actions could be taken

UCAS invites OFFA, HEFCW, the Scottish Funding Council, and the Department for the Economy in Northern Ireland to consider the evidence and findings in this report in relation to guidance they may issue to HEPs, in relation to access and outcome agreements.

UCAS invites those responsible for the regulation of HE to consider whether there would be value in establishing a requirement for regular training on unconscious bias for those involved in admissions decision-making.



The Applicant Experience (via UCAS)

This chart represents the process flow for the applicant experience: all the stages an individual might go through to become a full-time undergraduate student at a UK higher education institution.

The **green** areas denote the sequential stages of the applicant experience, whilst **purple** areas denote the process steps occurring within, and overlapping, those stages. Each step in the process is an opportunity for applicant and institution to interact: the quality of that interaction will dictate whether or not the most suitable students for institutions progress onto the most appropriate courses for those applicants. Co-ordinated activity across all steps is therefore vital in managing the flow of potential into higher education. **Pale purple** areas do not constitute essential steps within the application process, but are elements that may enhance interaction within a step and enrich the applicant experience.

Individual institutions may wish to map their own processes against this flow chart to review where staff with different responsibilities can best co-ordinate efforts to maximise the potential of attracting, nurturing and recruiting the most appropriate students to succeed at their institution.

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