UCAS' response to the Office for Students' consultation, 'A new approach to regulating access and participation in English higher education'

Introduction

UCAS is an independent charity, running the UK's national admissions service. Every year, we help around 700,000 students apply for full-time undergraduate courses, at nearly 400 UK universities and colleges. We provide relevant and timely information and advice about all post-18 opportunities, a comprehensive course search tool, and manage nearly three million applications. We support students in making informed choices through extensive information and advice services, that include 53 UK-wide events, personalised and audience-specific content on ucas.com, strategic partnerships, social media, and our contact centre.

For UCAS, widening access and participation is about ensuring everyone who can benefit from higher education (HE) can do so – and to go on to succeed once enrolled. We work in partnership with charities and others, to provide practical and inspiring information, advice, and resources for underrepresented groups, as well as producing reports to inform public debate.

We are committed to supporting our university and college customers in achieving their widening participation (WP) goals, through the provision of timely, sector-wide data, analysis and insights, making more than two million data points freely available, and developing innovative analytical tools and services.

In responding to this consultation, we have focused on English universities and colleges and those applying to English universities and colleges, but consideration needs to be given to the impacts of any changes on students and providers across the rest of the UK. We would also suggest that the Office for Students (OfS) engages with the Commission on Widening Access in Scotland, and HEFCW in Wales, to understand UK-wide initiatives and how the divergence of policy may impact on cross-border flows.

Our response centres on UCAS' role in driving efficiencies to minimise the burden for providers, and promoting the value of our multiple equality measure (MEM) and tracking service, STROBE, in supporting widening access and participation. We hope this submission is of use and look forward to working with the OfS to support the advent of this new approach.

Impact report

UCAS is supportive of the elongated timeframes to create time and space for providers to think strategically about their widening access and participation activities, recognising that it often takes a prolonged and sustained period of engagement to realise the benefits of outreach.

It is important that the annual impact reports and action plans do not engender unnecessary burden for providers – we can help through the provision of timely and relevant data to inform both the setting of, and monitoring against, targets. For example, from 2019 onwards we will be supplying providers with more live cycle data, which should enable better monitoring of interventions.

We welcome the focus on gaps in access and participation, acknowledging that whilst entry rates for the most disadvantaged continue to rise, progress is stalling. In 2017, we saw that English 18 year olds from disadvantaged backgrounds were more likely to enter HE than ever before.[1] However, our data shows that little overall progress has been made since 2014 in narrowing the gap in progression between different groups who have as much potential to benefit from HE as any other.[2]

We note that one of the proposed objectives of the impact reports and action plans is to engage students. However, there is a risk that, unless this information is contexualised and clearly explained, it could discourage the very students providers want to attract. The key to successful contextualisation is understanding how students and advisers interpret and use this kind of information, and what additional information they would find most useful. UCAS' survey programme and our network of advisory groups provides a ready-made channel for soliciting this kind of feedback.

Targets

We're pleased to note the drive to encourage sector-wide consistency, by setting targets for widening access and participation. However, in seeking to define disadvantage based on a single measure, there are risks of blind spots. For example, we know from our research that students within POLAR3 quintile 3 are often overlooked, deemed neither 'advantaged' nor 'disadvantaged', and yet almost 10 percent of these students belong to subgroups (for example white men who receive free school meals) that have very low likelihoods of going to university or college.

We have developed the multiple equality measure (MEM) to help providers take a more inclusive approach to widening participation. The MEM brings together information on several equality dimensions, for which large differences exist in the probability of progression to HE. These equality dimensions include things such as sex, where someone lives (using POLAR3), secondary education school type, and Index of Multiple Deprivation.

We welcome the reference to 'intersection of underrepresentation' within the consultation and mention of the MEM specifically. UCAS is due to publish a summary and methodology paper to engender confidence in the accuracy and usefulness of the MEM as a standard equality measure across the higher education sector. We're looking forward to working closely with the OfS in the further development of this measure.

Understanding a provider's individual context is critical to facilitating an accurate interpretation of its progress towards WP. For the third year in succession, in January, we published a set of [equalities data](#) for over 130 of the UK's largest providers delivering full-time, undergraduate provision, to address questions about transparency in admissions, and to help providers benchmark their performance, and examine differences in offer and acceptance rates. Critically, our analysis places applicant numbers, and acceptance and offer rates, into the appropriate context, e.g. of population differences. This is especially important to understand the representation of different ethnic groups

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[1] The entry rate for MEM group 1 was 13.8 per cent in 2017, an increase of 0.2 percentage points (+1.2 per cent proportionally) from 2016, [UCAS' End of Cycle Report 2017](#).
[2] Between 2006 and 2014, the entry rate ratio of MEM group 5 versus group 1 fell, from 6.0 to 3.8. Since 2014, this entry rate ratio has remained constant. [UCAS' End of Cycle Report 2017](#).

in HE. We would be pleased to share our rationale and learnings from this work with the OfS, to help inform its guidance to providers.

In addition, we suggest that the OfS considers the inclusion of subject-level aims and targets. This is based on our data which illustrates that diverse student populations in a small number of subject areas can mask other gaps in representation. For example, removing applicants to nursing, education, and some social studies courses, would have a negative impact on the overall proportion of disadvantaged acceptances at 85% of the largest 75 providers.[3]

Tracking services

It is essential to evaluate which interventions work. We offer a tracking service, STROBE, which allows providers and WP charities to interact with the admissions database, and evaluate the impacts of their outreach and support activities.

Providers can use STROBE by sharing data with us (with permission) in relation to named individuals with whom they have worked. These can then be matched to the UCAS admissions database, and providers can receive aggregated statistics in relation to HE applications outcomes. The statistics available extend to each stage of the application process, from application to acceptance, and they can be broken down by university or university groupings.

A key strength of STROBE is its benchmarking service, which enables organisations to compare the relative effectiveness of different interventions, and to create synthetic control groups that mirror the test group in terms of demographics, prior academic attainment, and school. In the case of potential applicants, steps have been taken to mirror the behavioural predisposition to HE that may exist in outreach attendees. This process allows providers to make robust statements about statistically significant changes across all metrics and variables.

STROBE is available 'in-cycle', minimising the delay in obtaining results. We offer discounted rates for providers and those running public benefit programmes.

We have recently been approached by several of the National Collaborative Outreach Programme (NCOP) partnerships, to assist in their evaluative activities. We will be working with the OfS to determine how we might support the next phase of the initiative, including engagement through their Tracking and Evaluation Group.

Transparency information condition

For the past three years, we have published equalities data, covering applications, offers, and placed applicants by sex, area background, and ethnic group, for over 130 larger universities. Moreover, UCAS' analysis places applicant numbers, and acceptance and offer rates, into context to facilitate accurate interpretation.

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[3] Unpublished analysis using 2017 end of cycle data, and based on those providers with 1,000+ 18 year old acceptances in a combination of POLAR4 Q1, 2, 4, and 5. Analysis looks at the Q4/5 vs. Q1/2 ratio.

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

The sector has welcomed the publication of our equalities release – both through understanding the expected offer rates of a cohort of students and being able to benchmark themselves against other providers. Several providers have used the data to conduct self-assessments of their practices and identify areas where further investigation may be required as they seek to enhance these.

We remain committed to working with the OfS to minimise burden on providers in meeting the requirements set out by the transparency information condition through our equalities release data. As a priority, we are collaborating with the Higher Education Statistics Agency (HESA) to link together the equalities data with HESA data on student outcomes, to increase the value of this data set to providers.

We are also keen to explore how we might better serve our customers, through the development of additional services to support providers in interrogating the diversity of their student cohorts.

We recognise the imperative to understand how progression to HE differs across age ranges and would be able to broaden our equalities release to capture such information. This is particularly pertinent to mature students – an interest area for UCAS following our recent mature student campaign. The journey of a 21 year old will differ significantly from that of a 30 year old. Providers will undertake different interventions to reflect this.

Consistency is key, so we recommend evidence-based discussion with us and HESA, to inform the setting of meaningful age classifications. Indeed, UCAS and HESA are committed to promoting consistency in HE data definitions, which can be applied across the student journey.

We are more reluctant to recommend the inclusion of data related to disability, since this is self-declared and, as our analysis shows, there are subject issues around both data quality and coverage. Whilst we are working in partnership with charities such as Disability Rights UK to improve the accuracy and completeness of the information we collect, challenges remain. Moreover, numbers are likely to be very small, with zero being a not uncommon output once the appropriate data-rounding controls are applied.

Access and participation data set

We would want to understand whether there is an unmet need for such data, by unpacking its relationship with the transparency information and other freely available resources, as well as the role of the new Evidence and Impact Exchange (EIX). We already publish extensive sector-level commentary on equality, most notably through our annual end of cycle analysis of entry rates by equality measures, focusing on the UCAS MEM, and also including sex, ethnic group, income background, and area-based measures of disadvantage. This is published within seven weeks of the cycle closure and is in addition to the provider-level equalities data made available each January.

In terms of the proposed data, we would, once again, take the opportunity to support the sector-wide adoption of the MEM. Our modelling approach allows analysis of multiple equality characteristics simultaneously, to maximise accuracy in identifying those least likely to enter HE. It is only through such a sophisticated approach that we are likely to see a step-change in equality. The flexibility of the MEM also means that it not only has the potential to be used in targeting, outreach and evaluation, but crucially, can also be used for contextualised admissions.

We have recently partnered with the Fair Education Alliance (FEA) to publish the report 'Putting fairness in context: using data to widen access to higher education'. The report draws on provider case studies to research how contextual data is used, and makes recommendations on how to ensure providers have access to, and use, contextual data to widen access and participation. The report recommends the provision of 'alternative and more accurate measures' to local area data, citing the MEM as having the potential to improve the legitimacy and effectiveness of contextualised admissions practices.

For the 2018 admissions cycle, we worked with a small number of universities to test the feasibility of providing individual-level MEM data to providers at application stage. This cycle, all providers are invited to opt in to this modernised contextual data service (MCDS), which will run alongside our existing contextual data service.

Finally, we would repeat concerns about the need to carefully manage the publication of these kinds of data sets, to avoid the potential for misinterpretation by students. We would advocate further research with students and their advisers, to firstly understand their need and, secondly, mitigate against the risk of unintended consequences. UCAS is well placed to support the OfS in this through our applicant surveys, and groups and forums.