

UCAS briefing on the feasibility and practicality of applying an attainment threshold for access to student finance in England

UCAS has been asked by the independent panel supporting the Government’s Review of Post-18 Education and Funding to provide a briefing on considerations around the potential introduction of an attainment threshold, using the UCAS Tariff, for access to student finance in England as part of the broader work being undertaken by the Review.

When undertaking this briefing, UCAS has sought to answer the following questions:

- To what extent could the UCAS Tariff act as a means for aggregating across the range of qualifications that are used for entry to HE in order to support an attainment threshold for access to student finance?
- What impact would the introduction of an attainment threshold have on access to finance, and how could such an approach be contextualised to ensure students from disadvantaged backgrounds are not disproportionately impacted?

Within this briefing we also provide an assessment of some of the potential risks and issues which could arise from introducing such a policy, as well as considerations for the student journey and higher education providers. When considering these questions, a number of assumptions have been made, these are, that:

- The introduction of an attainment threshold will largely focus on ‘young’ applicants. These are students aged 18, 19 and 20. As mature applicants are more likely to apply to HE on the basis on acquired experience or prior learning at level 4 and above, alternative means would need to be devised to manage access to student finance.
- EU are out of scope since their treatment will depend on Government policy post-Brexit.
- Given students with lower grade profiles are more likely to have widening participation characteristics, there is a need to ensure that students from disadvantaged backgrounds are not disproportionately impacted. Therefore, contextualisation of these results to recognise this is required. A full equality impact assessment would be required on any proposed model.
- The Tariff is employed as a means of aggregating across a range of different qualifications used for entry to higher education (HE).
- The Tariff is also being considered as a collection of qualifications that could contribute towards any attainment threshold for access to student finance.
- UCAS is not advocating the use of Tariff and contextualising students’ attainment as the solution managing access to student finance, nor that the model set out below provides the only way of doing this. The analysis is intended to stimulate debate about potential options and the issues and challenges that would need to be considered further if policy makers wished to pursue this idea.

The structure of this paper is as follows:

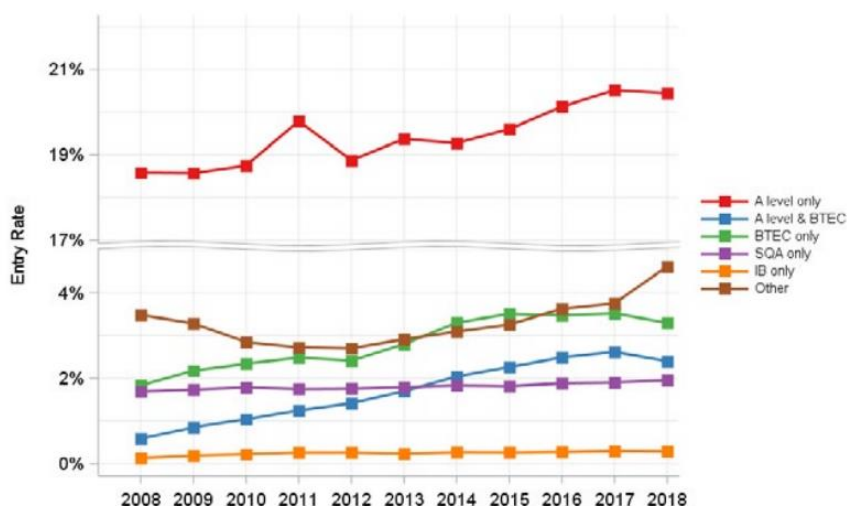
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Section 1: Qualifications and the UCAS Tariff

Young UK students entering higher education (HE) hold a wide range of different qualifications and combinations of qualifications. In 2018 59.8% of 18 year old UK domiciled applicants were accepted holding A levels only. As has been the case since 2008, the second most common single qualification type is BTECs, although the proportion of applicants holding only BTECs fell in the 2018 entry cycle, to 10.1% – a 1.0 percentage point decrease from 2017. Increasingly young students take a mixture of A levels and BTECs, 7.2% of UK 18 year old applicants were accepted on this basis in 2018.

In 2018, 15.7% of applicants entered holding qualifications defined as ‘Other’. This category, spanning over one thousand different qualifications, includes qualifications, such as Applied General qualifications that are not BTECs (for example OCR Cambridge Technicals), the Cambridge Pre-U or combinations of qualifications. The cohort holding qualifications classified as ‘Other’ increased 2.6 percentage points in the 2018 entry cycle.

Figure 1: UK 18 entry rates by qualification type (2008- - 2018)



If the review panel were to examine the introduction of an attainment threshold for access to student finance in England, it could consider one of the following:

- The identification of specific, named qualifications and grades that would satisfy a determined threshold. This approach would be similar to the way in which ‘high achieving’ students were classified under the student number control policy that was in place in England from the 2012 to 2014 entry cycle (commonly known as the AAB/ABB+ policy); although this excluded many qualifications taken by small numbers of students.
- Through a national assessment that is consistent across the entire student body or segmented by subject.
- Through setting a threshold using the UCAS Tariff¹. Students could then meet this threshold through the achievement of qualifications listed within the UCAS Tariff. It is this option that is explored throughout this briefing.

¹ The UCAS Tariff is a numerical score allocated to regulated Level 3/SCQF Level 6 qualifications. It was first introduced in 2001 and only includes qualifications delivered after this date. A detailed explanation of the Tariff can be found in Annex A.

Section 2: What impact would the introduction of an attainment threshold have on access to finance, and how could such an approach be introduced in a contextualised manner?

As noted above, students with lower levels of Level 3 attainment are more likely to have characteristics associated with widening participation. As will be shown later in this report, the introduction of an attainment threshold without any form of contextualisation is likely to have a disproportionate impact on these students. This assumes that student places are not segmented by student cohort, as is the case with student number controls in Scotland, where additional numbers are allocated to providers for students defined as SIMD20. In order to contextualise any attainment threshold, one option is to employ the UCAS multiple equality measure (see Annex A)

The benefits of this methodology are threefold:

- Accuracy – the assessment of disadvantage is accurate as it makes use of the MEM methodology
- Data-driven – the adjustments are made based on the distribution of attainment by background as observed in the UCAS data. The adjustments are therefore robust given the underlying assumptions made.
- Individual specific – the use of the modelled likelihood of entering HE to determine grade adjustment means that the adjustment procedure is highly granular, and so highly individualised.

An alternative method of contextualisation (not discussed further in this report) would be to use a general, discrete, adjustment for a given MEM group, wherein the attainment of every pupil in (say) MEM group 1 would be increased by (say) a single grade. While this has the benefit of being perhaps a more readily understandable method, there are downsides to such a method compared to the one outlined above. Firstly, there is a loss of granularity, as an adjustment applied to a single MEM group would not account for the fact that even within this single MEM group there are students with different characteristics, who have different likelihoods of entering HE (see table 1), and so are at different levels of disadvantage. Adjusting the attainment of all these students equally risks advantaging some students to a greater extent than is required, while not advantaging others enough. Secondly, a single attainment adjustment of arbitrary magnitude would result in a loss of robustness in that the adjustments are not based directly on the distribution of attainment by background observed in the UCAS data. To that extent it might be argued that there is a loss of individual specificity which weakens the robustness of this approach.

Analysis on the introduction of an attainment threshold and application of MEM to support contextualisation

All analysis that follows covers those 2018 English 18 year old applicants who were accepted for entry to higher education through UCAS (hereafter referred to as ‘acceptances’), and who provided information on their application to allow calculation of MEM group and grade adjustment. Any additional sub-setting of this group will be noted in the text. Note that totals may not add due to rounding.

Analysis related to attainment is based on the best 3 A level grades (or equivalent for BTECs) that an applicant presents with, the maximum attainment available therefore being 168 Tariff points, equivalent to A*A*A* at A level. Although grade profiles are often referred to for clarity, the analysis is based on Tariff point attainment, rather than specific grade profiles. As an example, when referring to an A level CCC threshold, this is based on a threshold of 96 Tariff points, so incorporates A level grade profiles such as ACB, BBD, A*C, etc.

Acceptances to higher education (HE) by MEM group

For baseline reference, the numbers of acceptances to HE by MEM group in 2018 are shown below, for those presenting with A level qualifications, BTEC qualifications, or a combination of the two:

Table 2: Acceptances by MEM group 2018 (Group 1 = most disadvantaged)

MEM group	A level acceptances	BTEC acceptances	A level + BTEC combination acceptances
MEM group 1	10,318	4,825	2,605
MEM group 2	18,572	6,399	3,895
MEM group 3	26,095	6,057	4,134
MEM group 4	35,386	5,717	4,437
MEM group 5	60,147	2,313	2,426
Total	150, 518	25,311	17,497

MEM group one acceptances are the least represented group among acceptances presenting with A level qualifications, comprising 6.9% of these acceptances, compared to MEM group five which makes up 40.0%. MEM group five acceptances have the lowest representation among both BTEC acceptances (9.1%) and those presenting with a combination of A levels and BTECs (13.9%).

Application of DDD threshold

Tables 3a-c show the number and proportion of those pupils that were accepted for HE entry who **do not** reach the level of an A level DDD (72 Tariff points) attainment threshold². For example, considering those acceptances who only presented with A levels, 1,541 of the 10,318 MEM group 1 acceptances (14.9%) do not reach the threshold. The overall percentage of all acceptances that do not reach the threshold is 8.1%, but this is not distributed evenly across MEM groups, with a higher proportion not reaching the threshold at lower MEM groups.

Table 3a: Number and proportion of A level only acceptances who DO NOT meet a DDD attainment threshold by MEM group

MEM group	Acceptances before threshold	Acceptances after DDD threshold in place	Acceptances below DDD threshold	Proportion of acceptances below DDD threshold (%)
MEM group 1	10,318	8,777	1,541	14.9
MEM group 2	18,572	16,254	2,318	12.5
MEM group 3	26,095	23,338	2,757	10.6
MEM group 4	35,386	32,586	2,800	7.9
MEM group 5	60,147	57,444	2,703	4.5
Total	150, 518	138,399	12,119	8.1

² The equivalent DDD cut off for BTEC or BTEC & A level applicants was applied at the equivalent Tariff points to DDD at A level, 72 Tariff points. Only an applicant's best 3 qualifications were included in the calculation of their Tariff points. BTECs included in the calculation include the Extended Diploma, the Diploma and National Foundation Diploma, the Subsidiary Diploma and the 90 credit BTEC diploma as well as all equivalent BTEC qualifications and some other less common level 3 BTEC qualifications. 72 Tariff points is equivalent to a D* and a P in two BTEC Subsidiary Diplomas or between an MMP and an MPP in the BTEC Extended Diploma.

Table 3b: Number and proportion of BTEC only acceptances who do not meet a 72 Tariff point attainment threshold by MEM group

MEM group	Acceptances before threshold	Acceptances after DDD threshold in place	Acceptances below DDD threshold	Proportion of acceptances below DDD threshold (%)
MEM group 1	4,825	3,963	862	17.9
MEM group 2	6,399	5,388	1,011	15.8
MEM group 3	6,057	5,184	873	14.5
MEM group 4	5,717	4,989	728	12.7
MEM group 5	2,313	2,073	240	10.4
Total	25,311	21,597	3,714	14.7

Table 3c: Number and proportion of A level and BTEC combination acceptances who do not meet a 72 Tariff point attainment threshold by MEM group

MEM group	Acceptances before threshold	Acceptances after DDD threshold in place	Acceptances below DDD threshold	Proportion of acceptances below DDD threshold (%)
MEM group 1	2,605	2,126	479	18.4
MEM group 2	3,895	3,270	625	16.0
MEM group 3	4,134	3,495	639	15.5
MEM group 4	4,437	3,839	598	13.5
MEM group 5	2,426	2,164	262	10.8
Total	17,497	14,894	2,603	14.9

Application of DDD threshold after contextualisation

Table 4 shows the number and proportion of A level only acceptances that do not meet the DDD threshold, but who would meet the threshold after grade contextualisation using the procedure outlined in Annex A.

All but one of the applicants in MEM group 1 who is below the DDD threshold would be adjusted back above this threshold after contextualisation, while all applicants from MEM group 2 and 3 would be adjusted back above. Around 56% of those from MEM group 4 would be adjusted above, and none from MEM group 5. This means that after contextualisation, 32.5% of all applicants who did not previously meet the DDD threshold would remain under the threshold, all of which would be from MEM groups 4 and 5.

The contextualisation naturally results in a lower proportion of the total population not meeting the DDD threshold. As shown in table 2a, prior to contextualisation, 8.1% of the total acceptances were below the DDD threshold. After contextualisation, this proportion falls to 2.6%.

Table 4: A level acceptances who would be move back above the DDD threshold after contextualization

MEM group	Acceptances below DDD threshold	Acceptances who are below DDD threshold, but who would be adjusted back above after contextualisation	Proportion of those below DDD threshold but who would be adjusted back above after contextualisation (%)
MEM group 1	1,541	1,540	99.9
MEM group 2	2,318	2,318	100.0
MEM group 3	2,757	2,757	100.0
MEM group 4	2,800	1,565	55.9
MEM group 5	2,703	0	0.0
Total	12,119	8,180	67.5

Application of different grade thresholds

Tables 5a-c show a summary of the proportion and number of total acceptances who fall below given attainment thresholds, for those that apply with A levels only (a), BTEC only (b) and the combination of A level and BTEC only (c). The values are shown both before and after attainment contextualisation. Also shown is the proportion of those acceptances who would not meet the threshold after contextualisation that are from MEM groups 4 and 5.

To illustrate, looking at A level only students (table 5a): An A level attainment threshold of CCD would mean that 26,477 A level only acceptances would fall below this threshold, representing 17.6% of the total A level only acceptances. After contextualisation, this number would reduce to 13,595 acceptances falling below the threshold (only 9.0% of total acceptances). Of these 13,595 who fall below, 821 would be from MEM groups one, two and three (the most disadvantaged groups) and 12,774 would be from MEM groups four and five (the most advantaged groups).

As a further example, looking at BTEC only students (table 5b), a BTEC attainment threshold of MMM would mean that 5,200 BTEC only acceptances would fall below this threshold, representing 20.5% of the total BTEC only acceptances. After contextualisation, this number would reduce to 2,647 acceptances falling below the threshold (10.5% of total acceptances).

Table 5a: Effect of different A level grade thresholds on A level only acceptances before and after contextualization

A level threshold	Before contextualization acceptances below threshold		After contextualization acceptances below threshold		MEM groups 1,2,3 acceptances below threshold (after contextualization)		MEM groups 4,5 acceptances below threshold (after contextualization)	
	Number	Proportion of total acceptances (%)	Number	Proportion of total acceptances (%)	Number	Proportion of total MEM group 1,2,3 acceptances (%)	Number	Proportion of total MEM group 4,5 acceptances (%)
EEE	2,819	1.9	429	0.3	1	0.0	428	0.0
DEE	4,769	3.2	807	0.5	1	0.0	806	0.1
DDE	7,730	5.1	1,925	1.3	1	0.0	1,924	2.0
DDD	12,119	8.1	3,939	2.6	1	0.0	3,938	4.1
CDD	18,306	12.2	7,481	5.0	2	0.0	7,479	7.8
CCD	26,477	17.6	13,595	9.0	821	1.5	12,774	13.4
CCC	36,797	24.4	23,092	15.3	4,595	8.4	18,497	19.4
BCC	49,338	32.8	35,269	23.4	9,637	17.5	25,632	26.8
BBC	63,588	42.2	50,431	33.5	16,146	29.4	34,285	35.9
BBB	78,455	52.1	67,077	44.6	23,373	42.5	43,704	45.7
ABB	93,559	62.2	84,500	56.1	30,891	56.2	53,609	56.1
AAB	107,543	71.4	100,952	67.1	37,689	68.5	63,263	66.2
AAA	119,920	79.7	115,515	76.7	43,360	78.9	72,155	75.5
A*AA	131,238	87.2	128,159	85.1	47,618	86.6	80,541	84.3
A*A*A	139,988	93.0	138,186	91.8	50,940	92.6	87,246	91.3
A*A*A*	145,543	96.7	145,081	96.4	53,506	97.3	91,575	95.9

Table 5b: Effect of different BTEC grade thresholds on BTEC only acceptances before and after contextualization

BTEC threshold	Before contextualization acceptances below threshold		After contextualization acceptances below threshold		MEM groups 1,2,3 acceptances below threshold (after contextualization)		MEM groups 4,5 acceptances below threshold (after contextualization)	
	Number	Proportion of total acceptances (%)	Number	Proportion of total acceptances (%)	Number	Proportion of total MEM group 1,2,3 acceptances (%)	Number	Proportion of total MEM group 4,5 acceptances (%)
PPP	1,391	5.5	128	0.5	20	0.1	108	1.3
MPP	2,837	11.2	482	2.0	38	0.2	444	5.5
MMP	3,891	15.4	1,234	4.8	295	1.8	939	11.7
MMM	5,200	20.5	2,647	10.5	1,281	7.4	1,366	17.0
DMM	7,062	27.9	4,972	19.6	3,067	17.7	1,905	23.7
DDM	9,498	37.5	7,909	31.2	5,320	30.8	2,589	32.2
DDD	11,936	47.2	11,012	43.5	7,749	44.8	3,263	40.6
D*DD	14,284	56.4	12,728	50.3	8,737	50.6	3,991	49.7
D*D*D	16,508	65.2	14,979	59.2	10,259	59.4	4,720	58.8
D*D*D*	19,009	75.1	18,146	71.7	12,520	72.5	5,626	70.1

Table 5c: Effect of different A level equivalent grade thresholds on A level + BTEC only acceptances before and after contextualization

A level equiv. threshold ³	Before contextualization acceptances below threshold		After contextualization acceptances below threshold		MEM groups 1,2,3 acceptances below threshold (after contextualization)		MEM groups 4,5 acceptances below threshold (after contextualization)	
	Number	Proportion of total acceptances (%)	Number	Proportion of total acceptances (%)	Number	Proportion of total MEM group 1,2,3 acceptances (%)	Number	Proportion of total MEM group 4,5 acceptances (%)
EEE	228	1.3	11	0.0	0	0	11	0.2
DEE	640	3.7	64	0.4	3	0	61	0.9
DDE	1,374	7.9	233	1.3	3	0	230	3.4
DDD	2,603	14.9	661	3.8	3	0	658	9.6
CDD	3,720	21.3	1,332	7.6	90	0.8	1,242	18.1
CCD	5,973	34.1	2,808	16.0	751	7.1	2,057	30.0
CCC	8,777	50.2	5,091	29.1	1,868	17.6	3,223	47.0
BCC	11,307	64.6	7,657	43.8	3,352	31.5	4,305	62.7
BBC	12,729	72.8	9,819	56.1	4,914	46.2	4,905	71.5
BBB	14,004	80.0	11,871	67.8	6,445	60.6	5,426	79.1
ABB	14,391	82.2	13,180	75.3	7,632	71.8	5,548	80.8
AAB	14,990	85.7	14,159	81.0	8,393	78.9	5,766	84.0
AAA	15,571	89.0	15,078	86.2	9,078	85.4	6,000	87.4
A*AA	16,097	92.0	15,725	89.9	9,516	89.5	6,209	90.5
A*A*A	16,542	94.5	16,277	93.0	9,870	92.8	6,407	93.4
A*A*A*	16,838	96.2	16,757	95.8	10,214	96.1	6,543	95.3

³ The A level equivalent thresholds for BTEC & A level applicants were applied at the equivalent Tariff points. Only an applicant's best 3 qualifications were included in the calculation of their Tariff points. BTECs included in the calculation include the Extended Diploma, the Diploma and National Foundation Diploma, the Subsidiary Diploma and the 90 credit BTEC diploma as well as all equivalent BTEC qualifications and some other less common level 3 BTEC qualifications. As an example, an A level equivalent threshold of AAA equates to 144 Tariff points, which is equivalent to MMM in the BTEC Extended Diploma (96 Tariff points) and an A grade at A level (48 tariff points).

Expansions of contextualisation procedure

The contextualisation carried out in this report covers 18 year old English A level student acceptances, which accounted for just over half of all England and Wales 18-21 year old acceptances through UCAS in 2018.

With suitable assumptions, the contextualisation procedure outlined in this report could be extrapolated to cover all Tariff-attracting qualifications, as well as young applicants aged 19-21, and those applicants domiciled in Wales.

Section 3: The student journey and practical considerations

The student journey

Students who wish to enter HE immediately after completion of their secondary education are likely to begin considering their HE choices from years 10 and 11 onwards and sometimes earlier, and this is linked to socio-economic background⁴. When doing this, students will start to investigate potential destinations, such as specific courses or providers, to understand what the requirements for these routes are, or may investigate what options are available to them based on the qualifications or subjects they are interested in taking.

When assessing these options, it is important that students fully understand what challenges and requirements they may encounter. If an attainment threshold for access to student support were to be introduced, students would need to understand what levels of achievement they would require in order to be eligible for student finance given that HE is unaffordable for the majority without access to loans. Therefore, it is important that students can access this information at this early point, recognising that it will be indicative and based on predicted grades and current circumstances. To support this cohort, data-driven information and advice resources would be needed that would allow students to input relevant information (such as predicted grades and school type) in order to understand what their attainment requirement may be.

It is common that students begin to narrow down their choices for HE towards the end of their first year of Level 3 study. Again it, is important that students understand what funding is likely to be accessible to them at this point and how this may relate to their potential Level 3 attainment.

Students that enter HE immediately after completion of their secondary education typically apply in the second year of their Level 3 study, with over 95% of 18-year-old applicants having submitted their application by the 15 January deadline. Students will then potentially receive and accept offers, whilst also applying for student finance (with the deadline for this typically in May).

A level exams are usually taken in May and June, with results confirmed in August (although the timetables for other qualifications vary). At this point, students would have received verified information on their Level 3 achievement and therefore would be able to confirm whether they are eligible for student support in England. Equally, the decision-making body (see below) would also be able to ratify eligibility⁵ at this point.

Once the applicant has received their examination results, they will either have their place in HE confirmed, or they will be eligible for Clearing. Any student exploring their options via Clearing would need to know whether they are eligible for student finance. It should be born in mind that waiting for confirmation of eligibility for financial support

⁴ [Through the lens of students: How perceptions of higher education influence applicants' choices. UCAS \(July 2016\)](#)

⁵ If the eligibility criteria included GCSE requirements, such as English and/or Maths, eligibility would not be able to be confirmed until the following week for those students that had pending qualifications of this nature.

as well as examination results is likely to add further to applicants' stress and anxiety. It may generate additional requests for examination re-marks.

Higher education provider considerations

When an 18 year old applicant applies to higher education, they generally do so with predicted Level 3 attainment. A university or college will normally make a conditional offer to the student based on this predicted attainment and confirm this place when a student receives their examination results. Under this model, students with pending qualifications would not receive confirmation that they are eligible for student finance until they have received their results. Those who receive unconditional offers would know much earlier that they have an HE place, but would then need to wait until exam results are released in order to be sure whether or not they will be eligible for access to student support.

UCAS operates a process known as the Awarding Body Linkage (ABL). Under embargo, we supply universities and colleges with select verified Level 3 attainment information to help them make confirmation decisions. This ensures that the majority of 18 year old applicants know whether or not they have secured their place in HE on A level results day.

If an attainment threshold were to be introduced for access to student finance in England, 18 year old applicants would generally not know if they have secured funding until they have received their results and, in the majority of cases, when their HE place has been confirmed. At this point verification of a student's eligibility would need to occur. It is UCAS' view that this could be delivered in two ways:

- Higher education providers could be responsible for verifying whether an applicant has met the required threshold for access to student finance. This would be a risk-based approach similar to the process around Tier 4 visas. As part of the confirmation process, UCAS would supply HEPs with verified qualifications information (via ABL) and an adjusted attainment level using the Multiple Equality Measure (assuming this attainment level is known) to support HEPs in confirming eligibility.
- UCAS could seek to supply Student Loan Company with adjusted qualification attainment for individual applicants to allow for confirmation of eligibility.

For both processes, consideration would have to be given to how students that have qualifications outside of the ABL process could be accommodated. UCAS would be happy to explore with the review panel how the ABL process could be enhanced to support this need.

What qualifications would contribute towards a student's eligibility?

Unless specified to the contrary by the higher education provider, a student could meet the terms of a Tariff offer through achieving a range of qualifications. For example, an offer of 96 Tariff points (in line with CCC at A level) could be achieved by the applicant achieving CCC/BCD/BBE at A level, MMM in a BTEC National Extended Diploma or a combination of smaller qualifications, such as Graded Music Examinations, ASDAN awards or AS levels. For this purpose, consideration should be given to whether all qualifications that attract Tariff points should be contribute towards a student's eligibility, or whether it should be a subset of qualifications (either a pre-defined list of qualifications, the qualifications that were used to make the admissions decision or other criteria based on qualification size).

Section 4: Risks and issues

There are numerous risks and issues that should be recognised when considering the potential implementation of an attainment threshold for access to student finance in England. From a UCAS perspective these would include:

- **Range of qualifications:** Our analysis indicates that 91% (186,774) of English 18 year old accepted applicants hold A levels, BTECs or a combination of the two. Including accepted applicants holding A levels plus other qualifications increases this figure to 94.7% (194,386). The other 5.3% (10,821), is made up of 0.54% (1,109) who have BTEC plus another qualification and 4.73% (9,712) who have neither BTECs nor A levels. Due to the

diversity of qualifications used for entry to higher education, any policy would need to consider how it would accommodate the range of qualifications held by applicants, particularly as the uptake of these qualifications often relates to the applicant's background.

- **Range of qualifications presented by applicants that attract Tariff points:** Our analysis indicates that 96.3% (197,520) of English 18 year olds have complete profiles of tariffed qualifications, with 2.6% (5,242) having partial coverage. Within our analysis we have identified 0.02% (44) of students that only have non-Tariffed qualifications, and a further 1.2% (2,401) that do not appear to have qualifications – this is a cohort that UCAS would wish to undertake further analysis of in order to understand their circumstances and progression route.

Whilst the majority of 18 year olds will hold qualifications that are listed on the Tariff, there are some notable examples of commonly held qualifications that do not attract Tariff points. For example, International A levels studied within the UK are a commonly held qualification, largely delivered in independent schools. These do not attract Tariff points as they are not Ofqual regulated. However, it could be appropriate to treat International A levels as 'tariffed' for this purpose. In addition, UCAS is confident it could allocate Tariff points to all regulated Level 3 qualifications under the current methodology if required. However, it should be noted that Level 3 Apprenticeships do not attract UCAS Tariff points due to challenges around their structure, and the enactment of any policy should be mindful of how these students could be accommodated.

- **Inclusion of mature students:** Mature students (aged 21 and over) are more likely to have qualifications that are not allocated Tariff points and to be applied on the basis of work experience rather than formal qualifications. Consideration would need to be given on how these students would be accommodated within any finance system.
- **Cross border considerations:** Careful consideration will need to be given to the potential UK cross border implications and how this could influence applicant behaviour.
- **It may not be possible to directly match the Tariff threshold with the combination of qualifications a student has undertaken:** Due to the different size bands and grade bands used in the Tariff calculation, it may not be possible to have a consistent attainment requirement across all qualifications. For example, if the threshold was set at 72 Tariff points, a student studying A levels would need to achieve DDD to meet this. However, a BTEC National Extended Diploma student (which make up three quarters of students that enter HE with BTEC only qualifications) would need to achieve MMP, which currently attracts 80 Tariff points. These 8 points would equate to a single A level grade.
- **Foundation years:** the entry requirements for a Foundation Year (for which students are currently able to access financial support) are normally significantly lower than their undergraduate equivalent, and fall below DDD at A level or below Level 3 entirely. Consideration would need to be given as to how this route would be supported and maintained if such a threshold is introduced, particularly as this route potentially supports widening participation. For example, completion of a standalone or integrated foundation year in itself could satisfy any threshold for access to student finance for further study.
- **The student information journey:** Timely information and advice is vital in supporting the student journey. Students following a 'traditional' journey will likely begin to consider their HE education choices when selecting their Level 3 qualifications and earlier. As part of this, students will wish to understand what qualifications and grades they require in order to reach their desired destination and whether or not they are likely to be able to access student finance. If an attainment threshold for access to student support were to be introduced, students would need to understand what levels of achievement they would require in order to be eligible. Given the adjustment that takes place as a result of the MEM, it may not be immediately obvious what this may be and may be perceived as opaque.
- **Pressure on qualification re-mark process:** In 2018, 5.6% of all GCE grades (57,750) were challenged and 1.2% of all grades awarded (12,140) were changed. The most commonly challenged GCE grade was grade B, accounting for 33% of requests. An attainment threshold for student finance may shift the focus of remark requests from grade B to lower grades, and also result in an increase in the number of requests that would have previously gone unchallenged (e.g. the student may have obtained a place at university or college, but not met the finance attainment threshold). Requests for reviews of marking ('Priority Service 2') must be received by the relevant awarding organisation seven days after the publication of GCE A level results. Awarding organisations subsequently have 15 calendar days to complete the review following receipt of the

request. For 2018, awarding organisations would need to have received the request by 23 August, and completed the review by 7 September, meaning a student may not be able to confirm their eligibility for student finance until September.

Section 5: Summary

Having analysed the feasibility of applying an attainment threshold to manage access to student finance, and exploring how this could be contextualised to minimise impact on the students from more disadvantaged backgrounds we offer the following reflections:

A model employing the UCAS Tariff and contextualising attainment using the MEM would provide coverage across the majority of 18 year old English students. However, given the number of different types of Level 3 qualifications, and the numerous ways in which these can be combined, establishing a clear attainment threshold for access to student finance that works for everyone is likely to be relatively complex to avoid disadvantaging young people who take non-traditional qualifications. An alternative approach will be needed for mature learners and those applying to HE with apprenticeships.

Whilst it may be possible to contextualise attainment to minimise these impacts to some extent, it is not possible to eliminate them completely.

The impacts of uncertainties about access to student finance prior to application on the mental health and well-being of students should not be underestimated.